PB82-229527

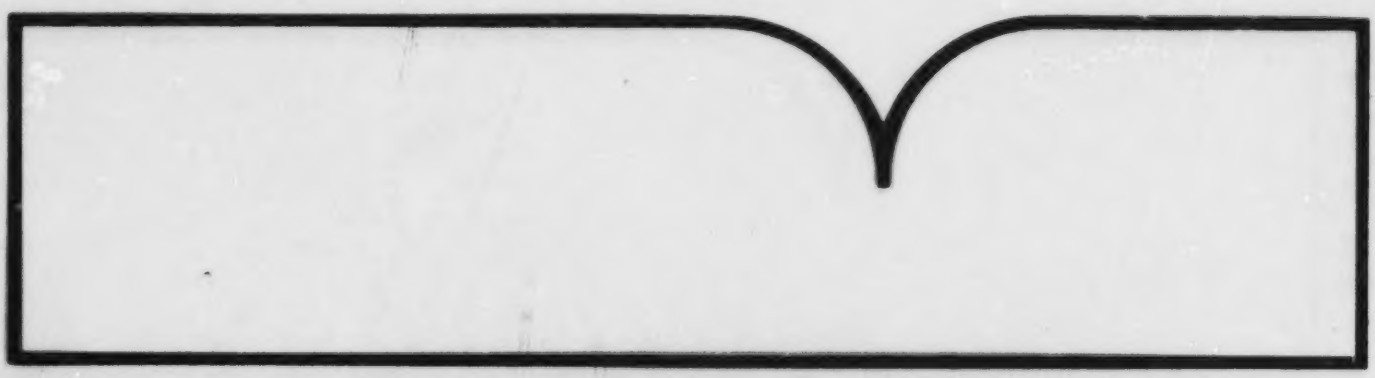
# Environmental Impact Statement
# Wastewater Treatment Facilities
# Little Rock (Adams Field), Arkansas

Little Rock Wastewater Utility, AR

Prepared for

Environmental Protection Agency
Dallas, TX

Jun 82



U.S. Department of Commerce
National Technical Information Service
NTIS

United States
Environmental Protection
Agency

Region 6
1201 Elm Street
Dallas TX 75270

EPA 906/9-82-007
June 1982

PB82-229527

Water

EPA

# Environmental Impact Statement

Final

## Wastewater Treatment Facilities
## Little Rock (Adams Field), Arkansas

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SPRINGFIELD, VA 22161

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16. ABSTRACT

This EIS has been prepared concurrently with the 201 facilities plan for the Adams Field/Little Maumelle Facilities Planning Area. EPA's preferred alternative is to expand the Adams Field Wastewater Treatment Plant, evaluate additional interceptor alignment alternatives along Fourche Creek, and continue to use septic tank systems on sites having suitable soils in the Little Maumelle Valley.

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A

United States
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Region 6
1201 Elm Street
Dallas TX 75270

EPA 906/9-82-007
June 1982

Water

EPA

# Environmental Impact Statement

Final

## Wastewater Treatment Facilities
## Little Rock (Adams Field), Arkansas

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION VI
1201 ELM STREET
DALLAS, TEXAS 75270

June 11, 1982

TO ALL INTERESTED AGENCIES, PUBLIC GROUPS AND OFFICIALS:

Enclosed for your review and comment is the Final Environmental Impact Statement (EIS) on EPA's Construction Grant action for the Adams Field Wastewater Treatment Facilities in Little Rock, Arkansas (Grant No. C-050490-1).

Comments on this Final EIS should be sent to Mr. Clinton B. Spotts, Regional EIS Coordinator, EPA, Region 6, 1201 Elm Street, Dallas, Texas 75270. It is requested that comments be submitted within 30 days of the publication of the "Notice of Availability" in the Federal Register.

A "Record of Decision," documenting the completion of the environmental review process and EPA's decision on the Construction Grant, will be sent to agencies and interested parties making substantive comments on the Final EIS and those who request a copy.

Sincerely yours,

Frances E. Phillips

Dick Whittington, P.E.
Regional Administrator

Enclosure

B

FINAL ENVIRONMENTAL IMPACT STATEMENT
FOR
WASTEWATER TREATMENT FACILITIES
LITTLE ROCK (ADAMS FIELD), ARKANSAS
GRANT NO. C-050490-1

RESPONSIBLE AGENCY: U.S. Environmental Protection Agency, Region 6

ACTION BEING CONSIDERED: Possible awarding of design and construction funds for wastewater treatment facilities in Little Rock, Arkansas

COOPERATING AGENCIES: None

CONTACT FOR FURTHER INFORMATION:

Clinton B. Spotts
Regional EIS Coordinator
U.S. Environmental Protection Agency,
Region 6
1201 Elm Street
Dallas, Texas 75270
Phone: Comm. (214) 767-2716
FTS 729-2716

ABSTRACT: This EIS has been prepared concurrently with the 201 facilities plan for the Adams Field/Little Maumelle Facilities Planning Area. EPA's preferred alternative is to expand the Adams Field wastewater treatment plant, evaluate additional interceptor alignment alternatives along Fourche Creek, and continue to use septic tank systems on sites having suitable soils in the Little Maumelle Valley.

DATE COMMENTS DUE:

RESPONSIBLE OFFICIAL:

Frances E. Phillips

DICK WHITTINGTON, P.E.
REGIONAL ADMINISTRATOR

# SECTION 1

# SUMMARY

## Introduction

The U.S. Environmental Protection Agency (EPA) under the Federal Water Pollution Control Act Amendments of 1972, the Clean Water Act Amendments of 1977, and the Municipal Wastewater Construction Grant Amendments of 1981, awards a grant for construction of wastewater treatment facilities to assist municipalities in the abatement of water pollution. The Little Rock Wastewater Utility (LRWU) has a grant for preliminary planning of the proposed expansion of the treatment capacity of the Adams Field Wastewater Treatment Plant (WWTP). The EPA has determined that the proposal requires an Environmental Impact Statement (EIS) under the provisions of the National Environmental Policy Act.

## Problems

The existing Adams Field Wastewater Treatment Plant is designed for treating an average daily flow of 27 million gallons per day (MGD) to an effluent quality of 30 milligrams per liter (mg/l) of biochemical oxygen demand (BOD) and 30 mg/l of total suspended solids. Peak treatment capacity is estimated to be 44 MGD, based on the capacity of the low lift pump station. Sludge is disposed by vacuum filtration and incineration with an estimated capacity of less than 70,000 pounds per day.

During 1978 and 1979 the Adams Field Wastewater Treatment Plant treated an annual average day flow of 28.5 MGD and produced an effluent that was discharged to the Arkansas River which contained on the average 55.5 mg/l of suspended solids and 24 mg/l biochemical oxygen demand

(BOD). During the two years the average monthly flows varied from a low of 21.2 MGD to a high of 38.7 MGD. On the same basis suspended solids in the final effluent varied from a low of 19 mg/l to a high of 150 mg/l and the BOD varied from a low of 10 to a high of 50 mg/l. As a result of an improved operation and maintenance program at the plant, effluent quality has improved in recent years. During the period from January through June 1981, average daily flows ranged 24.3 to 34.0 MGD, BOD concentrations varied from 8 to 19 mg/l, and TSS varied from 24 to 43 mg/l. According to the National Pollutant Discharge Elimination System (NPDES) permit, the final effluent should not exceed 30 mg/l of suspended solids and 30 mg/l of BOD. In addition, the plant currently produces approximately 100,000 lbs/day of residual solids, which is 43 percent more than the plant was designed to handle.

There are no reported health problems associated with the use of septic tanks in the Little Maumelle Valley. The 208 plan did express concern over potential problems which might occur if development were to occur on unsuitable soils. A brief survey of septic tanks as part of the facility plan indicated that approximately 40 percent of the systems have had operational problems, but that these are a result of underdesigning rather than unsuitability. The 208 plan indicated several pockets of population density which could constitute substantial habitation under EPA regulations.

Alternatives Considered by Grantee

During the course of preliminary planning, the Little Rock Wastewater Utility considered alternatives for each of the three major portions of the proposed project: expanding capacity at Adams Field WWTP, expanding capacity of the Fourche Creek interceptor system, and

provide treatment to residents of the Little Maumelle Valley. Because of the usefulness of the existing treatment facilities at the Adams Field WWTP, the only alternatives considered were to either expand the existing liquid treatment facilities or no action. For the Fourche Creek interceptor, two alternatives were examined: a gravity pipeline or a force main along a route adjacent to the present interceptor. Both the facility plan and environmental analysis indicate that the force main was slightly more preferable, but that wetland resources may be adversely affected. For the Little Maumelle Valley, a wide range of alternative treatment systems were considered. And, both the facilities planning and environmental analysis document that accommodation of growth only on suitable soils for septic tank-soil absorption systems is the most cost effective and environmentally preferred alternative.

Alternatives Available to EPA

Basically, there are three alternatives available to EPA. First EPA could award a grant to the LRWU for construction of the facilities as proposed. Secondly, EPA could award a grant for construction of facilities, contingent upon certain conditions or design changes to mitigate environmental damage. Or finally, EPA could deny the construction grant to the applicant for this project.

Evaluation of the Facilities Plan

In light of the present and projected deficiencies of the wastewater treatment facilities, the Facilities Planning consultant has proposed a number of improvements to the existing liquid treatment facilities. These improvements include replacing some of the raw

wastewater pumps, constructing an additional 115 foot diameter primary settling basin, adding four additional aeration basins, constructing an additional 145 foot diameter final settling basin, making improvements to the internal sludge pumps, and construction of a 20 million gallon retention/equalization basin to avoid overloading the outfall pipe. The total estimated costs of these improvements would be $11,052,000.

To alleviate overflows along the Fourche Creek interceptor, the LRWU proposes to construct a 30-inch force main and pump station along a 33,000 foot route adjacent to the existing interceptor. The estimated construction cost would be $3,160,000 and would have an annual O&M cost of $47,300.

Approximately 45 percent of the area within the expected growth area of the Little Maumelle Valley is comprised of soils suitable for septic tanks, while the remaining soils are considered unsuitable because of low percolation rates. The Facility Plan proposes that the unsewered portion of the Little Maumelle Valley continue use of septic tank-soil absorption systems. Since many soils are not suitable, growth would be limited to those soils which have been determined to be suitable for septic tanks. This would be enforced through municipal zoning and building permit limitations.

Construction of the additional liquid treatment facilities would create minor short-term dust and noise usually associated with construction activities. Since the facilities will be located on the existing property, no biological resources will be adversely affected. Improved treatment capacity will improve effluent quality, odor, and public health. User fees would increase by approximately 5 percent. Construction of the force main along the Fourche Creek interceptor would

result in temporary soil erosion and turbidity during the construction period. Approximately 7 acres of wetlands and 12 acres of transitional and upland habitats would be cleared, resulting in an adverse loss of biological resources. Operation of the force main will result in increased energy consumption and user fees, but the additional capacity will prevent manhole overflows into Fourche Creek. Implementation of the septic tank plan will limit population growth within the Little Maumelle Valley to areas with suitable soils. This will require additional planning, zoning, and surveillance of septic tank system installation to insure that adequate systems are installed. Little impact is foreseen on the natural environment from this plan.

Evaluation of Not Awarding a Grant

Not awarding a construction grant for expansion of the Adams Field WWTP may result in overloading of the existing treatment facilities if they are not expanded, which in turn will result in adverse effluent quality, public health hazards, and potential odor problems. These adverse impacts would be alleviated if the LRWU funded construction on its own, but user fees would be significantly higher. Not constructing the Fourche Creek Interceptor will eventually result in chronic overflows of untreated sewage into Fourche Creek. However, the Facility Planning Consultant has noted that this may be postponed until 1990 by diverting excess flows into the collection system of the South Fourche WWTP. Since no construction grant is necessary to implement the proposed Little Maumelle Plan, not granting funds will have effects similar to the proposed plan. However, if the septic tank management constraints proposed as part of the preferred alternatives are not implemented by local and state agencies, then future septic tank failures may

occur. These failures would result in localized water pollution and public health hazards. Not awarding an EPA grant at this time does not preclude construction of a centralized system under an alternative funding source at some future date.

## Conclusion and EPA Action

EPA's preferred alternative is to award a construction grant to expand the capacity of the Adams Field Wastewater Treatment Plant. EPA's decision on the Fourche Creek Interceptor will be deferred until additional alternatives are examined and compliance with Executive Order 11990 is assured. This order, entitled Protection of Wetlands, requires that federal assistance for new construction located in wetlands be avoided, unless there is no practicable alternative to such construction, and that the proposed action includes practicable measures to minimize harm to wetlands which may result from such use. Under the criteria of the Construction Grants program, the Little Maumelle Valley should continue the use of individual septic tank-soil absorption systems on sites having suitable soils.

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## SECTION 2

## REVISIONS TO THE DRAFT EIS

During the review of the Draft EIS, several revisions were made to the text. The following four pages have been revised and replace those in the Draft EIS. A vertical line in the margin indicates the portion of the text which has been revised.

Facility Plan. Figure 1 shows the current service areas of the Adams Field WWTP.

The Little Rock Wastewater Utility is currently constructing a new wastewater treatment plant, known as the Fourche Plant, to which will be diverted flows from a portion of the existing Adams Field service area. However, the remaining service area's wastewater flow to the Adam's Field Plant is projected to increase to an average flow of 30.9 MGD by the year 2010. Peak flows are projected to reach 70 MGD. Construction of the Fourche Plant is scheduled to be completed in 1982.

The existing facilities have been analyzed by the Facility Planning consultant and each treatment process has been assessed for adequacy under the 2010 flow condition. The Facility Planning consultant has found that raw sewage pumps, primary clarifiers, aeration basins, final clarifiers, and sludge facilities will be inadequate under the projected flow. The Facility Planning consultant has also identified the existing Fourche Creek interceptor to be inadequate to handle increased flows projected by the year 2010.

Upgrade Existing Liquid Treatment Facilities: In light of the present and projected deficiencies of the wastewater treatment facilities, the Facility Planning consultant has proposed a number of improvements to the existing liquid treatment facilities. These improvements include replacing some of the raw wastewater pumps, constructing an additional 115 foot diameter primary settling basin, adding four additional aeration basins, constructing an additional 145 foot final settling basin, making improvements to the internal sludge pumps, and construction of a 20 million gallon retention/equalization basin to avoid overloading the outfall pipe (see Figure 2). The total estimated costs of these improvements would be $11,052,000.

trial discharges, discharge of Fourche Creek, and urban runoff. Degradation of water quality between the two stations is apparent, but the most striking is the increase in biochemical oxygen demand (BOD), suspended solids, total phosphates, and fecal coliforms.

Water quality data within the Fourche Creek Basin has been limited to intensive surveys conducted by the Arkansas Department of Pollution Control and Ecology and by the University of Arkansas Little Rock as part of the 208 Water Quality Management Plan. In general, water quality in Fourche Creek violates phosphorus, dissolved oxygen, and fecal coliform criteria. High phosphorus and low dissolved oxygen are consistent with the slow sluggish nature of the Fourche Bottoms. Fecal coliform violations, as well as high values for cadmium, manganese, oil and grease, and pH, generally occur during high flow conditions. All of these conditions can be attributed to urban runoff; i.e., during a rainfall event the precipitation washes accumulation of dirt and oil and grease from streets and other impervious surfaces into Fourche Creek. High fecal coliforms could also be the result of sanitary sewer overflows.

There has apparently never been any water quality data collected within the Little Maumelle River watershed. However, the presence of considerable suspended algae, observed at Highway 10, would indicate that some degradation of water quality does exist in this area.

The Arkansas Department of Pollution Control & Ecology is responsible for determining assimilative capacities and wasteload allocations for streams in Arkansas. A computer model for the Arkansas River showed that the river could assimilate all projected wasteloads. However, this

do not reflect the planned land use indicated by the Suburban Development Plan, this alternative has been rated adverse for its secondary impact on land use.

I. ARCHAEOLOGICAL AND HISTORICAL RESOURCES:

The Arkansas Archaeological Survey and the Arkansas Historic Preservation Program have been contacted regarding the project. Due to the variety of potential sites, an inventory has been postponed pending definitive alternative selection. It is anticipated that the archeological survey work will be completed and coordinated with the State Historic Preservation Officer after the detailed design of the facilities is available and before construction begins. The pertinent correspondence has been included in the coordination chapter.

In the event of an emergency discovery of archeologicalresources during construction, the proper contacts are the Secretary of the Interior through the Departmental Consulting Archeologist, Interagency Archeological Services, Washington, D.C. 20243, telephone (202) 273-3750, and Arkansas State Archeologist, Box R, Fayetteville, Arkansas 72701, telephone (501) 575-3556. We would also anticipate that in the event of a significant discovery, that appropriate mitigation measures would be undertaken.

J. PUBLIC HEALTH:

Currently, the wastewater treatment operations by the City of Little Rock are not adequately treating the sewage. The present capacity of the treatment plant is not adequate which results in the raw sewage not being treated properly and effluent quality problems. At flows greater than design, the settling basin becomes less efficient operating at or below normal efficiency levels. At present, there are six aeration basins which have with the associated piping a hydraulic capacity that is less than necessary to treat peak flows. Inadequately treated sewage may pose health hazards by creating conditions which may foster the development of diseases and infections.

The majority of the soils of the Little Maumelle watershed are unsuitable for septic tank systems. If septic tank units were installed in these areas, the potential for failures is heightened and public

Karen W. Williams was the environmental planner for economics for the EIS. Ms. Williams earned bachelor's degrees in urban affairs and economics and a master's in economics from Texas Christian University. Her past project experience includes population and land use projections and municipal and industrial inventory for studies in Arkansas and Texas. She is the planner in charge of Historical/Archeological Analysis Review for all Freese and Nichols projects.

Mr. Barber, Mr. Gattis, and Ms. Williams are employed by the consulting engineering firm of Freese and Nichols, Inc., of Fort Worth, Texas. Dr. Gibson and Ms. Phillips are employed by C. C. Johnson & Associates, Inc., an environmental engineering firm located in Silver Spring, Maryland.

# SECTION 3

# COORDINATION

## Public Meetings

Over the course of the project, numerous public and private agencies were contacted for information and comment. These include Little Rock Department of Comprehensive Planning, Little Rock District of the Army Corps of Engineers, Arkansas Employment Security Division, Metroplan, Arkansas Department of Health, Arkansas Game & Fish Commission, Arkansas Department of Pollution Control & Ecology, Pulaski County Health Department, Arkansas Natural Heritage Commission, Arkansas Department of Natural and Cultural Heritage, Arkansas Ecology Center, the Nature Conservancy, Arkansas Natural and Scenic Rivers Commission, Arkansas State Highway and Transportation Department, Arkansas Archeological Survey, Little Rock Airport Commission, and the U.S. Fish and Wildlife Service and interested citizens.

EPA conducted two major public meetings during the preparation of the EIS. On March 10, 1980, a public meeting was held to receive public comment on issues pertaining to the EIS on expansion of the Adams Field WWTP. The meeting was well attended but most of the speakers were primarily concerned with the proposed 208 Plan for the Little Rock-North Little Rock region rather than the specific issues pertaining to the proposed Adams Field expansion. The concerns raised over centralized treatment systems in low density areas, however, do have bearing on the proposed project.

The second was the public hearing on the Draft EIS, held on Thursday evening, November 12, 1981, at 7:30 in the University of

Arkansas at Little Rock Library. Approximately 20 people addressed the hearing and 29 written comments were received as part of the public review record on the Draft EIS. Oral statements made at the meeting were centered on the three following subjects:

(1) Agreement with the need for the proposed expansion of the Adams Field WWTP and endorsement of this portion of the project.

(2) Comments, both in favor and against, on the preferred alternative in the facilities plan and EIS to continue the use of individual septic tank-soil absorption systems in the Little Maumelle Valley.

(3) A question raised by representatives of the community of College Station regarding their exclusion from consideration under this facility plan despite their need for sewer service as documented in the 208 Wastewater Management Plan.

During the course of the project, the Citizens Advisory Committee reviewed all interim documents and meetings were held at the conclusion of major tasks. The Citizens Advisory Committee provided guidance on developing parameter weights used for screening alternatives. The Citizens Advisory Committee has endorsed the findings of the EIS, with the exception of preferring the gravity line alternative for the Fourche Creek interceptor. The gravity line was favored because of its lower operation and maintenance cost and energy requirements.

## Written Comments on the Draft EIS

Letters commenting on the Draft EIS have been received from various agencies. These follow, along with EPA responses.

DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
FORT WORTH REGIONAL OFFICE
221 WEST LANCASTER AVENUE
P.O. BOX 2905
FORT WORTH, TEXAS 76113

REGION VI

IN REPLY REFER TO:

October 29, 1981

RECEIVED
NOV 2
S & A DIVISION

Mr. Clinton B. Spotts
Regional EIS Coordinator
U.S. Environmental Protection Agency
1201 Elm Street
Dallas, Texas 75270

Dear Mr. Spotts:

The Draft Environmental Impact Statement for Wastewater Treatment Facilities, Little Rock (Adams Field), Arkansas, has been reviewed in the Department of Housing and Urban Development's Little Rock Area Office and Fort Worth Regional Office, and it has been determined that the Department will not have comments on the statement.

Sincerely,

Victor J. Hancock
Environmental Clearance Officer

3-3

Response

No response necessary.

United States Department of Agriculture

Soil Conservation Service

P.O. Box 2323
Little Rock, Arkansas
72203

NOV 1 : 1

RECEIVED
NOV 17 1981
S & A DIVISION

Ms. Frances E. Phillips
Acting Regional Administrator
U.S. Environmental Protection Agency
1201 Elm Street
Dallas, Texas 75270

Dear Ms. Phillips:

We have reviewed the Draft Environmental Impact Statement for the Wastewater Treatment Facilities in Little Rock, Arkansas, and have found that the document adequately addresses our concerns.

Sincerely,

Mack A. Mull Acting for
Jack C. Davis
State Conservationist

cc: Norman A. Berg, Chief, SCS, Washington, D.C.

Response

No response necessary.

3-4

DEPARTMENT OF TRANSPORTATION
FEDERAL AVIATION ADMINISTRATION
SOUTHWEST REGION
P. O. BOX 1689
FORT WORTH, TEXAS 76101

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NOV 2 1981
S & A DIVISION

OCT 30 1981

Mr. Clinton B. Spotts
Regional EIS Coordinator
Environmental Protection Agency
Region 6
1201 Elm Street
Dallas, TX 75270

Dear Mr. Spotts:

We have completed our review of the Draft Environmental Impact Statement for Wastewater Treatment Facilities, Little Rock (Adams Field), Arkansas, and have no comments.

We appreciate the opportunity for review.

Sincerely,

Richard L. Rodeni

Gene L. Faulkner
Chief, Planning and Programming Branch

Response

No response necessary.

3-15

Federal Emergency Management Agency

Region VI Federal Center Denton, Texas 76201

December 1, 1981

RECEIVED
DEC 4
S & A DIVISION

Mr. Clinton B. Spotts
Regional EIS Coordinator
U.S. Environmental Protection Agency
1201 Elm Street
Dallas, Texas 75270

Dear Mr. Spotts:

The following are our comments on the Draft Environmental Impact Statement on the Wastewater Treatment Facilities in Little Rock (Adams Field), Arkansas.

1. Little Rock and unincorporated Pulaski County are both participating in the National Flood Insurance Program (NFIP). To ensure their continued eligibility in the NFIP, all new construction in the flood plain must be built in accordance with their flood plain management ordinances. As noted in the DEIS, FEMA has mapped the 100-year flood plain in both communities.

2. Of the nine major alternatives considered, the Adams Field alternative to upgrade the liquid treatment facilities appears to be the most acceptable alternative since it has no apparent impact on the flood plain or wetlands and best supports the intent of E.O. 11988, Floodplain Management, and E.O. 11990, Protection of Wetlands.

If we may offer further assistance, please let us know by writing or calling (817) 387-5811, extension 271.

Sincerely,

Cheryl A. Hoke

Cheryl A, Hoke
Emergency Management Specialist
Natural & Technological Hazards Division

3-6

Response

No response necessary.

United States Department of the Interior

OFFICE OF THE SECRETARY
Office of Environmental Project Review
Post Office Box 2088
ALBUQUERQUE, NEW MEXICO 87103

RECEIVED
NOV 23 1981
S & A DIVISION

ER-81/2172

NOV 19 1981

Mr. Clinton B. Spotts
Regional EIS Coordinator
Environmental Protection Agency
1201 Elm Street
Dallas, Texas 75270

Dear Mr. Spotts:

We have reviewed the draft environmental statement for Wastewater Treatment Facilities, Little Rock (Adams Field), Arkansas, and have the following comments.

Although the section on the geology of the study area is adequate, there is no mention of mineral resources or mineral recovery operations. Sand and gravel deposits occur in the vicinity of the study area. The preferred alternative, should have no adverse impacts on mineral resources or their development in the study area. Also, the proposed project should not have significant adverse impacts on fish and wildlife resources.

We acknowledge the coordination with the State Historic Preservation Officer; however, the final statement should contain the following: "In the event of an emergency discovery of archeological resources during construction, the proper contact is the Secretary of the Interior through the Departmental Consulting Archeologist, Interagency Archeological Services, Washington, D. C. 20243, telephone (202) 273-3750. We would also anticipate that in the event of a significant discovery, that appropriate mitigation measures would be undertaken."

Thank you for the opportunity to comment on this statement.

Sincerely,

Raymond F. Churan
Regional Environmental Officer

3-7

Response

Mineral resources and extraction activities were discussed as part of Working Paper No. 3- Environmental Setting, which is included in the Technical Support Document.

Section IV.I. has been changed to include notification procedures for discovery of archeological resources during construction.

GENERAL COUNSEL OF THE
UNITED STATES DEPARTMENT OF COMMERCE
Washington, D.C. 20230

NOV 18 1981

Ms. Frances E. Phillips
Acting Regional Administrator
U. S. Environmental Protection
Agency - Region VI
1201 Elm Street
Dallas, Texas 75270

Dear Ms. Phillips:

This is in reference to your draft environmental impact statement entitled "Wastewater Treatment Facilities - Little Rock, (Adams Field), Arkansas." The enclosed comment from the National Oceanic and Atmospheric Administration is forwarded for your consideration.

Thank you for giving us an opportunity to provide this comment, which we hope will be of assistance to you. We would appreciate receiving four copies of the final environmental impact statement.

Sincerely,

Robert T. Miki
Director of Regulatory Policy

Enclosure: Memo from Joyce M. Wood
Office of Ecology and Conservation
NOAA

318

UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration

October 21, 1981

TO: PP/EC - Joyce M. Wood

FROM: OA/C5 - Robert B. Rollins

SUBJECT: DEIS 8110.02 - Wastewater Treatment Facilities, Little Rock (Adams Field), Arkansas

The subject statement has been reviewed within the areas of the National Ocean Survey's (NOS) responsibility and expertise, and in terms of the impact of the proposed action on NOS activities and projects.

Geodetic control survey monuments may be located in the proposed project area. If there is any planned activity which will disturb or destroy these monuments, NOS requires not less than 90 days' notification in advance of such activity in order to plan for their relocation. NOS recommends that funding for this project includes the cost of any relocation required for NOS monuments. For further information about these monuments, please contact Mr. John Spencer, Director, National Geodetic Information Center (OA/C18) or Mr. Charles Novak, Chief, Network Maintenance Branch (OA/C172), at 6001 Executive Boulevard, Rockville, Maryland 20852.

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Response

Specific project elements which may disturb geodetic control survey monuments will not be determined until the preparation of detailed design. At that time, the National Ocean Survey will be notified of any required relocations of mounuments. Relocations are grant eligible under the Construction Grants program.

DEPARTMENT OF THE ARMY
LITTLE ROCK DISTRICT, CORPS OF ENGINEERS
POST OFFICE BOX 867
LITTLE ROCK, ARKANSAS 72203

SWLED-PV

11 December 1981

SUBJECT: Draft Environmental Impact Statement, Wastewater Treatment Facilities Little Rock (Adams Field), Arkansas

Mr. Dick Whittington
Regional Administrator, Region VI
U.S. Environmental Protection Agency
1201 Elm Street
Dallas, Texas 75270

Dear Mr. Whittington:

Thank you for the opportunity to comment on the Draft Environmental Impact Statement for the proposed improvements to the Little Rock Adams Field wastewater treatment facilities. The Little Rock District is particularly interested because of our role in the development of the 208 Water Quality Management Plan for this area. The Corps was responsible for preparing much of the technical input to that study as part of our Little Rock Metropolitan Area Urban Study, which addressed the overall water resources needs of the area.

We are concerned that Maumelle alternative 1 which involves continued use of septic tanks in areas with suitable soils is not realistic. Historically state and local health departments have had a very difficult time insuring that septic tank systems are not installed in unsuitable soils. There are no zoning or building permit systems which limit residential growth outside the city limits except in the flood plains. Consequently, alternative 1 is the same as the no-action alternative.

The Draft Environmental Impact Statement refers to a special study conducted as part of the Water Quality Management Plan. That study projected that "While the construction of sewerage facilities would most likely increase the rate of development in the area, it is felt that this development will occur regardless since the area is fast becoming a desirable location to live in terms of status." There is no reason to conclude that this projection is no longer valid so it would seem unwise to forego the option of a centralized system at this time.

When final plans for the selected alternatives are complete, they should be submitted for review for possible Corps of Engineers permit requirements.

Sincerely,

K. E. [illegible]

3-10

Response

EPA recognizes that historically the state and local health departments have had difficulties in controlling septic tanks in unsuitable areas. However, pursuant to Act 402 of 1977, Arkansas General Assembly, the State Health Department has the regulatory authority to enforce regulations to prohibit issuance of permits or require additional specific management practices where unusual site conditions warrant them. It is therefore the opinion of EPA that the institutional mechanisms exists, in association with zoning within the City of Little Rock, to implement the proposed alternative.

EPA also recognizes the recommendations of the special study prepared as part of the Water Quality Management Plan. However, EPA understands that the conclusions in that study were made prior to the availability of the detailed soil survey by the Soil Conservation Service. The survey indicates that septic tanks can be operated efficiently in certain areas within the study area.

EPA recognizes the strong development pressure that exists within the Little Maumelle Study Area and the Water Quality Management Plan's conclusions and recommendations may be valid for long term conditions. However, under EPA's policies and regulations for funding new collector sewers (EPA PRM 78-9), the existing problems do not warrant expenditure of funds for new sewers when the proposed septic tank alternative is more cost effective. The EIS has also shown that the population projected in the 208 Special Study can be accomodated within the existing sewer service area or in suitable soils. EPA does not feel that the proposed action precludes use of a centralized collection system under a different funding source.

DEPARTMENT OF THE ARMY
SOUTHWESTERN DIVISION, CORPS OF ENGINEERS
1114 COMMERCE STREET
DALLAS, TEXAS 75242

REPLY TO ATTENTION OF

17 NOVEMBER 1981

SWDPL-R

SUBJECT: Draft Environmental Impact Statement for Wastewater Treatment Facilities Little Rock (Adams Field), Arkansas

RECEIVED
NOV 19
S & A DIVISION

Mr. Dick Whittington
Regional Administrator, Region VI
U.S. Environmental Protection Agency
1201 Elm Street
Dallas, Texas 75270

Dear Mr. Whittington:

The Draft Environmental Impact Statement (DEIS) for the Adams Field Wastewater Treatment Facility has been reviewed by my staff. Comments on the DEIS are inclosed.

Thank you for the opportunity to review this DEIS. If you have any questions or need further assistance, please contact Dr. Walter Gallaher, Chief of Environmental Resources Branch. He can be contacted at (214) 767-4521.

Sincerely,

for MG Hugh G. Robinson COL CE
HUGH G. ROBINSON
Major General, USA
Division Engineer

1 Incl
as

3-11

DEIS, Adams Field WWT Facilities, Little Rock, Arkansas

COMMENTS

1. The DEIS does not adequately address plans by other entities federal, state, and local to alleviate the wastewater treatment problems. Specifically, little information is given on the South Fourche Treatment Plant. On page 11 under Project History, some information is presented on the South Fourche Plant. However, the DEIS should address these concerns:

   a. Capacity of the South Fourche plant;
   b. Scheduled completion for the South Fourche plant;
   c. Proposed service area;
   d. Possibility of serving a portion of the Adams Field service area. If the Fourche Plant is scheduled for completion prior to the proposed completion date for the Adams Field expansion, the Fourche Plant could possibly serve some of the service area being served by the Adams Field WWTP?

2. Page 51, Water Quality, 2nd Paragraph. If there has never been any water quality data collected in the Little Maumelle River watershed, the assumption that water quality is generally excellent is invalid. The presence of large amounts of algae in natural waters tends to indicate:

   a. Variation in dissolved oxygen levels;
   b. Variation in pH with pH being higher during the day;
   c. The presence of at least two nutrients, nitrogen and phosphorus;
   d. Taste and odor problems, which are commonly associated with algae.

Recommendation: A logical assumption on water quality in the Little Maumelle River watershed would be:

Since there has never been any water quality data collected in the Little Maumelle River watershed, the general water quality is not known. However, the presence of considerable suspended algae, observed at Highway 10, would indicate that some degradation of water quality does exist in this area.

3. Pages 68-69, Biological Elements, Fourche Creek Interceptor Alternatives. Both alternatives would impact wetlands. Alternative 2, an element of the overall EPA proposed alternative, would require the clearance of 7 acres of wetland vegetation and 7 acres of upland habitat resulting in an irretrievable loss. The DEIS does not identify the beneficial values of the wetland, if any, nor does the DEIS address any adverse impacts related to the loss of wetland vegetation. The DEIS should also discuss appropriate measures to minimize unavoidable adverse impacts to beneficial wetlands.



Response

1. The Project History section has been revised to include greater background information on the South Fourche Plant. The service area is indicated on Figure 1 in the Draft EIS as Area V. EPA is proposing that the South Fourche Plant be utilized on an interim basis to relieve the existing Fourche Creek Interceptor while the Grantee examines additional alternatives.
2. EPA concurs and the text has been corrected.
3. EPA will defer awarding a construction grant for the Fourche Creek Interceptor alternatives, until the Grantee has evaluated additional alternatives. As part of that analysis, an assessment of wetland values and discussion of mitigation measures will be discussed.

(404) 262-6649

November 16, 1981

RECEIVED
NOV 18 19
S & A DIVISION

Mr. Clinton B. Spotts
Regional EIS Coordinator
U.S. Environmental Protection Agency
Region VI
1201 Elm Street
Dallas, Texas 75270

Dear Mr. Spotts:

We have completed our review of the Draft Environmental Impact Statement for Wastewater Treatment Facilities, Little Rock (Adams Field), Arkansas. We are responding on behalf of the Public Health Service.

The final document should indicate if the proposed action has been prepared in accordance with Executive Order 11990 - Protection of Wetlands, as it relates to the 26 acres of wetlands to be cleared.

We foresee no adverse health impacts as a result of the proposed action.

Thank you for the opportunity to review this draft statement. We would appreciate receiving a copy of the final document when it becomes available.

Sincerely yours,

Frank S. Lisella, Ph.D.
Chief, Environmental Affairs Group
Environmental Health Services Division
Center for Environmental Health

3-113

Response

EPA has determined to defer construction grant for construction of an additional Fourche Creek interceptor until the Grantee has examined additional alighnment alternatives which would avoid construction in the Fourche Bottoms wetlands. The preliminary planning indicates that the overflows can be relieved in the interim through cross connections with the South Fourche WWTP collection system.

6ES

STATE OF ARKANSAS
DEPARTMENT OF FINANCE AND ADMINISTRATION
P.O. BOX 3278
LITTLE ROCK • 72203

OFFICE OF
INTERGOVERNMENTAL
SERVICES
PHONE (501) 371-1874

RECEIVED
JAN 26 1982
6 ES

January 21, 1982

Frances E. Phillips, Acting
Regional Administrator
U.S. Environmental Protection Agency
Region VI
1201 Elm Street
Dallas, TX 75270

RE: EIS-0305 - Wastewater Treatment Facilities Little Rock (Adams Field), Arkansas

Dear Mr. Phillips:

The State Planning and Development Clearinghouse is in receipt of the above environmental document pursuant to Section 102(2)(c) of the National Environmental Policy Act of 1969 and the Arkansas Project Notification and Review System.

To carry out the review and comment process, this document was forwarded to members of the Arkansas Technical Review Committee. Resulting comments received from the Technical Review Committee which represent the position of the State of Arkansas are attached. Forthcoming comments will be forwarded to you for your consideration.

The State Clearinghouse wishes to thank you for your cooperation with the Arkansas Project Notification and Review System.

Sincerely,

State Clearinghouse

JD/vsp
Enclosures
cc: John Saxton, ASWCC

3-14

STATE OF ARKANSAS
DEPARTMENT OF FINANCE AND ADMINISTRATION
P.O. BOX 3278
LITTLE ROCK • 72203

OFFICE OF
INTERGOVERNMENTAL
SERVICES
PHONE (501) 371-1074

# MEMORANDUM

TO: All Technical Review Committee Members

FROM: Syd Willbanks, Manager
State Planning & Development Clearinghouse

SUBJECT: 404 Notice No. _____

EIS No. EIS-0305 - Wastewater Treatment Facilities

DATE: October 15, 1981 Little Rock, (Adams Field), Arkansas

Please review the above stated document under provisions of Section 404 of the Clean Water Act Section 102 (2) (c) of the National Environmental Policy Act of 1969, and the Arkansas Project Notification and Review System. PLEASE MAIL YOUR COMMENTS WITHIN FIFTEEN (15) DAYS TO JOHN P. SAXTON, CHAIRMAN, TECHNICAL REVIEW COMMITTEE - 1318 WEST CAPITOL, BUILDING A, LITTLE ROCK, ARKANSAS 72203.

☑ Support

☐ Comments Attached

☐ Do Not Support (Comments Attached)

☐ Support With Following Conditions

☐ Non-degradation Certificate Issued (applies to Dept. of P.C.&E. only)

No comment

Signed Randall Feiertag Date 10-16-81

Agency Arkansas Forestry Comm.

Response

No response necessary

3-15

STATE OF ARKANSAS
DEPARTMENT OF FINANCE AND ADMINISTRATION
P.O. BOX 3278
LITTLE ROCK • 72203

OFFICE OF
INTERGOVERNMENTAL
SERVICES
PHONE (501) 371-1874

# MEMORANDUM

TO: All Technical Review Committee Members

FROM: Syd Willbanks, Manager
State Planning & Development Clearinghouse

SUBJECT: 404 Notice No. _____

EIS No. EIS-0305 - Wastewater Treatment Facilities

DATE: October 15, 1981 Little Rock, (Adams Field), Arkansas

3-16

Please review the above stated document under provisions of Section 404 of the Clean Water Act Section 102 (2) (c) of the National Environmental Policy Act of 1969, and the Arkansas Project Notification and Review System. PLEASE MAIL YOUR COMMENTS WITHIN FIFTEEN (15) DAYS TO JOHN P. SAXTON, CHAIRMAN, TECHNICAL REVIEW COMMITTEE - 1515 WEST CAPITOL, BUILDING A, LITTLE ROCK, ARKANSAS 72203.

☑ Support

☐ Do Not Support (Comments Attach.)

☐ Comments Attached

☐ Support with Following Conditions

☐ Non-degradation Certificate Issued (applies to Dept. of P.C.&E. only)

Response

No response necessary

Signed _____ Date 10/16/81

Agency ARKANSAS GEOLOGICAL COMMISSION
3815 WEST ROOSEVELT ROAD
LITTLE ROCK, ARKANSAS 72204

STATE OF ARKANSAS
DEPARTMENT OF FINANCE AND ADMINISTRATION
PO BOX 3278
LITTLE ROCK • 72203

OFFICE OF
INTERGOVERNMENTAL
SERVICES
PHONE (501) 371 1074

# MEMORANDUM

TO: All Technical Review Committee Members

FROM: Syd Willbanks, Manager
State Planning & Development Clearinghouse

SUBJECT: 404 Notice No. _____

EIS No. EIS-0305 - Wastewater Treatment Facilities

DATE: October 15, 1981 Little Rock, (Adams Field), Arkansas

Please review the above stated document under provisions of Section 404 of the Clean Water Act Section 102 (2) (c) of the National Environmental Policy Act of 1949, and the Arkansas Project Notification and Review System. PLEASE MAIL YOUR COMMENTS WITHIN FIFTEEN (15) DAYS TO JOHN P. SAXTON, CHAIRMAN, TECHNICAL REVIEW COMMITTEE - 1318 WEST CAPITOL, BUILDING A, LITTLE ROCK, ARKANSAS 72203.

☐ Support

☐ Do Not Support (Comments Attached)

☐ Comments Attached

☐ Support with Following Conditions

☐ Non-degradation Certificate Issued (applies to Dept. of P.C.&E. only)

☒ No comment

Signed Everett H Phillips Date Oct 16, 1981

Agency Arkansas Water & Air Pollution Control Commission

IGS/SC 0100-003-80

Response

No response necessary

3-17

# Arkansas Soil and Water Conservation Commission

1614 West Capitol
Building A
Little Rock, Arkansas 72201
Phone 501-371-1611

**MEMORANDUM** Environmental Impact Statement

**TO:** Syd Willbanks, Manager, State Planning and Development Clearinghouse

**FROM:** John P. Saxton, Chairman, Technical Review Committee

**DATE:** October 28, 1981

**SUBJECT:** EIS-0305. Wastewater Treatment Facilities, Little Rock, (Adams Field) DEIS.

The Technical Review Committee has reviewed the above captioned document. No adverse comments were received. This document and comments are attached.

JPS:ba

Enclosures

3-18

RECEIVED
OCT 30 1981
INTERGOVERNMENTAL
SERVICES
STATE CLEARINGHOUSE

STATE OF ARKANSAS
DEPARTMENT OF FINANCE AND ADMINISTRATION
P.O. BOX 3278
LITTLE ROCK • 72203

OFFICE OF
INTERGOVERNMENTAL
SERVICES
PHONE (501) 371-1074

RECEIVED

MEMORANDUM

TO: All Technical Review Committee Members

FROM: Syd Willbanks, Manager
State Planning & Development Clearinghouse

SUBJECT: 404 Notice No. _____

EIS No. EIS-0305 - Wastewater Treatment Facilities

DATE: October 15, 1981 Little Rock, (Adams Field), Arkansas

Please review the above stated document under provisions of Section 404 of the Clean Water Act Section 102 (2) (c) of the National Environmental Policy Act of 1969, and the Arkansas Project Notification and Review System. PLEASE MAIL YOUR COMMENTS WITHIN FIFTEEN (15) DAYS TO JOHN P. SAXTON, CHAIRMAN, TECHNICAL REVIEW COMMITTEE - 1918 WEST CAPITOL, BUILDING A, LITTLE ROCK, ARKANSAS 72203.

☒ Supports

☐ Comments Attached

☐ Does Not Support - Comments Attached

☐ Supports with Following Conditions

☐ Non-degradation Certificate Issued (applies to Dept. of P.C.&E. only)

Signed Lamar Edwards Ext. 27 [illegible]

Agency Coastal & Water Conservation Commission

Response

No response necessary.

3-19

STATE OF ARKANSAS
DEPARTMENT OF FINANCE AND ADMINISTRATION
P.O. BOX 3278
LITTLE ROCK • 72203

OFFICE OF
INTERGOVERNMENTAL
SERVICES
PHONE (501) 371-1676

# MEMORANDUM

OCT 19 1981

TO: All Technical Review Committee Members

FROM: Syd Willbanks, Manager
State Planning & Development Clearinghouse

SUBJECT: 404 Notice No. _____

EIS No. EIS-0305 - Wastewater Treatment Facilities

DATE: October 15, 1981 Little Rock, (Adams Field), Arkansas

Please review the above stated document under provisions of Section 404 of the Clean Water Act Section 102 (2) (c) of the National Environmental Policy Act of 1969, and the Arkansas Project Notification and Review System. PLEASE MAIL YOUR COMMENTS WITHIN FIFTEEN (15) DAYS TO JOHN P. SAXTON, CHAIRMAN, TECHNICAL REVIEW COMMITTEE - 1515 WEST CAPITOL, BUILDING A, LITTLE ROCK, ARKANSAS 72203.

☐ Support

☐ Do Not Support (Comments Attached)

☒ Comments Attached

☐ Support With Following Conditions

☐ Non-degradation Certificate Issued (applies to Dept. of P.C.&E. only)

P.C. OF OUR RECENT COMMENTS ATTACHED.

Signed [signature] 10/19/81

Agency ARK. GAME & FISH COMM.

IGS/SC 0100-003-80

AN EQUAL OPPORTUNITY EMPLOYER

3-20

Carl Hunter
Assistant Director

# Arkansas Game & Fish Commission

October 14, 1981

RECEIVED
OCT 16 1981
S & A DIVISION

Mr. Clinton B. Spotts
Regional EIS Coordinator
U. S. Environmental Protection Agency
Region 6
1201 Elm Street
Dallas, Texas 75270

Dear Mr. Spotts:

We are in receipt of the Draft Environmental Impact Statement dated October, 1981 concerning Wastewater Treatment Facilities, Little Rock (Adams Field), Arkansas. The draft report appears to be complete, in order and adequately descriptive of fish and wildlife resources in the project area.

Arkansas Game and Fish Commission Biologists recognize that this facility will upgrade the present wastewater treatment plant and will meet State and Federal water quality standards. It is anticipated, therefore, that there will be insignificant effects to fish and wildlife resources.

The opportunity to comment on this proposal is appreciated and we have no additional comments at this time.

Yours very truly,

Craig K. Uyeda,
River Basins Biologist

CKU:ac

3-21

Response

No response necessary.

ARKANSAS DEPARTMENT OF HEALTH
4815 West Markham Street
Little Rock, Ark. 72201

November 9, 1981

Mr. John P. Saxton, Chairman
Technical Review Committee
1818 West Capitol, Building A
Little Rock, AR 72203

RE: Environmental Impact Statement
Wastewater Facilities - Adams
Field & Little Maumelle Valley
Little Rock, Arkansas
82 E 301-4

Dear Mr. Saxton:

The Environmental Impact Statement for the Adams Field Plant and Little Maumelle Valley has been reviewed by this office. We are particularly disappointed with the recommendation for "no action" in the Little Maumelle Valley. We find the report to be lacking in the analysis of both alternatives and impact particularly regarding public health and surface water quality. Further, we would go on record as disapproving the report based on its recommendations for the Little Maumelle area. Specific comments are as follows.

1. The plan fails to identify a beneficial impact on public health resulting from the upgrading of facilities at Adams Field. Improving the effluent quality from the Adams Field Plant will help decrease the fecal coliform count downstream of Little Rock where body contact recreation, such as swimming and skiing, although discouraged, frequently occurs.

2. The plan fails to identify the beneficial impact on public health and surface water quality that would result with the installation of either the gravity interceptor or the force main on Fourche Creek. Those familiar with the area know that a major contributor to the water quality violations in Fourche Creek for dissolved oxygen, phosphorous, and fecal coliform is the surcharging of

3-22

Response

The DEIS does not recommend "no-action" in the Little Maumelle area, but rather recommends properly designed and operated septic tank-soil absorption systems only on soils which are suitable for such systems.

In response to specific comments, we offer:

1. The DEIS recognizes that the bacterial discharges to the Arkansas River will be improved by upgrading the existing treatment facilities. However, when the improved effluent is discharged into the Arkansas River, the overall improvement in the River was judged as not great enough to receive a score of beneficial. The important factor is the comparison of alternatives, with no action having an adverse impact.

2. For reasons similar to those cited above, the proposed alternatives were not expected to improve public health and water quality to a degree sufficient to receive a beneficial rating. The five overflows identified in the infiltration/inflow analysis can all be corrected by minor improvements, or by completion of other projects not related to these proposed alternatives.

3. The Facility Plan examined a total of 14 alternatives of providing wastewater service to the presently unsewered portion of the Little Maumelle Valley. The four alternatives presented in the DEIS were selected after a preliminary screening, as documented in the Technical Support Document.

The septic tank failures, found by the Facility Planning consultant, were all attributed to an underdesign of the soil absorption system, rather than unsuitable soils. In fact, the Soil Conservation Service estimates that approximately 45 percent of the soils in the proposed service area are suitable for septic tank systems and not rated as poor soils. Commonly, property owner's associations would implement Alternative 3, though LRWU could, if it chose to do so. Either of them apparently has legislative authority under Act 402 of 1977. EPA does not feel that the proposed alternative is in conflict with Act 402, with said Act stating "that individual sewage disposal systems, when properly designed and constructed in suitable soils, provide renovation of wastewater...".

overloaded mains through manholes into the Creek. In addition, Fourche Creek traverses a large part of the metropolitan area. Public contact with the Creek, although not presently extensive, will increase with the development of urban parks on Fourche Creek such as that proposed by the Corps of Engineers. By relieving some of the hydraulic loading on existing interceptors, the frequency of overloading manholes can be reduced and water quality improved for aesthetic and public health benefits.

3. We see no practical difference between the first three alternatives presented for the Little Maumelle Valley since all rely on various types of onsite sewage disposal systems. The mound system, designed for marginally permeable soils, has about the same success rate as septic tanks and is subject to the same limitations of proper design and installation. Therefore, it can be assumed that the failure rate for mounds installed in the Little Maumelle Valley would be the same as the 30-40% failure rate for existing septic tanks in the area, particularly in light of the area's poor soils. Further we view the "cluster" concept in Alternative 3 as impractical because of the lack of a specific authority for maintenance, and because of the difficulty in obtaining suitable disposal sites and right-of-way to those sites. Alternatives 1 through 3 are in conflict with the Sewage Disposal Systems Act #402 of 1977 which calls for central public sewer in areas of poor soils and dense population.

   Most importantly, the report fails to identify the impact that Alternatives 1 through 3 will have on public health and surface water quality in the Little Maumelle area. There are strong trends toward development in the area and this trend will continue, albeit more slowly, whether the area has central sewer or not. However, given the normal failure rate for septic tank and mounds systems, runoff from these failing systems combined with the effluent of numerous package aeration systems, which are notorious for their poor maintenance, will result in a degradation of water quality and possible adverse public health consequences for those using the Little Maumelle River for recreation. One has only to view the consequences of dense septic tank concentrations in areas such as McAlmont or to count the numerous package plants presently discharging into the upper Fourche and its tributaries in western Pulaski and eastern Saline Counties to realize that the Little Maumelle area will



The proposed alternative does not call for new systems in unsuitable soils, nor would it allow dense development.

EPA policy states that "new collector sewers should be funded only when the systems in use for disposal of wastes from the existing population are creating a public health problem, contaminating groundwater, or violating point source discharge requirements of the Act." Contacts with the Pulaski County Health Department and the Arkansas State Health Department in August 1980 revealed no known health problems associated with septic tanks in the Little Maumelle area.

have a similar fate. While not specifically advocating central sewer for the Little Maumelle Valley, we do feel that that Alternative presents the most sound proposal for protecting public health as well as other areas of concern. We feel the Impact Statement does a poor job in evaluating alternatives and their impact. We view its recommendations for the Little Maumelle as a major deficiency, and error, in the report.

We appreciate the opportunity to review the Impact Statement. If you should have any questions concerning this matter, please feel free to call.

When submitting correspondence pertaining to this project, please include our reference number 82 E 301-4.

Sincerely,

T. A. Skinner

T. A. Skinner, P.E.
Chief Engineer
Division of Engineering

TAS:BM:RH:jp

cc: Mr. Clinton B. Spotts
Environmental Protection Agency

Little Rock Wastewater Utility ✓

Department of Pollution Control and Ecology

Freese & Nichols, Inc.

Metroplan

RESOLUTION NO. 1

LITTLE ROCK WASTEWATER UTILITY
CITIZEN'S ADVISORY COMMITTEE ON
THE ADAMS FIELD WASTEWATER TREATMENT PLANT EXPANSION

The Citizen's Advisory Committee (CAC) was formed in 1980 to provide public participation in the planning of improvements to the Adams Field Plant, and its service area, including the valley of the Little Maumelle River. The CAC has studied the Facility Plan, prepared by the Utility's Engineers, Alvord, Burdick and Howson. The CAC has studied the pre-draft Environmental Impact Statement, (EIS) and supporting working papers, prepared by the Utility's EIS consultants, Freese and Nichols/ C.C. Johnson & Associates.

At a meeting held in the Continental Building Conference Room on September 2, 1981, the CAC reviewed the pre-draft EIS, and recommends its publication as a Draft EIS by the U.S. Environmental Protection Agency. The CAC suggests that in its final draft form, the text of the EIS be revised to be specific about the environmentally sensitive areas in the study, and the effect the alternatives considered would have on the relationships in these areas.

The CAC also recommends that a maximum effort be expended to effectively inform the general public of the issues addressed in the EIS, and the alternative considered. The CAC feels that the public information effort be directed towards encouraging public involvement in the Public Hearing planned for the Draft EIS and the Facility Plan, tenatively set for early November, 1981.

The CAC elected member Richard J. Baldauf as Chairman, and authorized him to sign resolutions on behalf of the Committee.

ADAMS FIELD CITIZEN'S ADVISORY COMMITTEE

Richard J. Baldauf, Chairman

3-25

Response

Environmentally sensitive areas (such as floodplains, wetlands, critical habitats, and prime farmlands) were identified in Working Paper No. 3 and the impacts of the proposed alternatives on these areas were discussed in Working Paper No. 5 (in Technical Support Document).

We agree that the balance among species is an important environmental factor and that this relationship is "sensitive". However, we must point out that the purpose of an EIS is to present an evaluation of alternatives for consideration in planning and not simply to provide the reader an understanding of ecology.

RESOLUTION

A RESOLUTION OF THE SEWER COMMITTEE OF THE CITY OF LITTLE ROCK, ARKANSAS, COMMENTING ON AN ENVIRONMENTAL IMPACT STATEMENT, AND EXPRESSING THE INTENT OF THE COMMITTEE TO CONTINUE EXPANDING THE SEWER SYSTEM IN THE VALLEY OF THE LITTLE MAUMELLE RIVER, IN NORTHWEST LITTLE ROCK.

WHEREAS, the Sewer Committee is charged with the responsibility of operating, maintaining, replacing and improving the Sanitary Sewer System serving the city of Little Rock, Arkansas, and

WHEREAS, the Committee has been engaged in the planning for improvements and enlargements to the city's Adams Field Wastewater Treatment Plant and service area which includes the valley of the Little Maumelle River in Northwest Little Rock, and

WHEREAS, the Committee has allowed and encouraged the formation of Sewer Improvement Districts and the development of subdivisions in the Little Maumelle Valley by the construction of sewage pumping facilities, and

WHEREAS, Engineering studies commissioned by the Committee have identified and verified the need and justification for enlargement and strengthening of the Little Maumelle Valley sewage pumping facilities, but have advised that such improvements are not eligible for Federal Grants, and must be paid for with funds generated in the community, as an accommodation to growth, and

WHEREAS, the Committee has on previous occasions publicly stated its priorities for expansion of the city's Wastewater System in the 1980's as:

1. Construction of the Fourche Wastewater Treatment Facilities to better serve Southwest Little Rock.
2. Enlargement and modernization of the Adams Field Wastewater Treatment Facilities to better serve

3. Strengthening and improvement of the Wastewater pumping facilities serving the Little Maumelle Valley, so as to remove any sewer capacity restrictions to orderly growth in this portion of the city.

and

WHEREAS, a Draft Environmental Impact Statement (DEIS) dated October, 1981, concerning improvements to the city's Adams Field Treatment Plant, including the Little Maumelle service area has been published by the United States Environmental Protection Agency (USEPA) and this DEIS concludes that the most economical and environmentally sound method of providing wastewater service to the populations, both existing and future, of the Maumelle Valley not presently served by public sewers is by utilization of septic tanks or other individual absorption systems, and

WHEREAS, a public hearing on this DEIS is planned for 7:30 p.m., November 12, 1981, at which time the public may offer its comments and opinions on the DEIS, and

WHEREAS, it is the opinion of the Sewer Committee, following a study of the DEIS, that:

1. The conclusions of the DEIS regarding improving the hydraulic capacity of the Adams Field Wastewater Treatment Plant are sound, and the result of logical methodology.
2. The conclusions of the DEIS regarding handling and treatment of wastewater sludge are moot, due to the Committee's actions in July, 1981 to transport all sludge from the Adams Field Plant to the regional sludge digestion complex under construction at the new Fourche Plant.
3. The conclusions of the DEIS regarding increasing the hydraulic capacity of the interceptor sewers discharging into the Adams Field Plant by construction of a pumping station are not sound, due to



Response

1. No response necessary.
2. No response necessary.
3. EPA will defer making a construction grant for a Fourche Creek interuptor until additional alternatives are considered (see page 5). At that time, a re-analysis of the cost effectiveness of a force main can be made.

understated pump station energy and maintenance costs, and the alternative of additional gravity flow pipes is preferred.

4. The conclusions of the DEIS regarding the utilization of septic tanks for wastewater service in the presently unsewered portion of the Little Maumelle Valley are not sound, due to erroneous assumptions as to the reliability of septic tanks, and due to the lack of an effective method of control of septic tank installation and use.

NOW, BE IT THEREFORE RESOLVED BY THE SEWER COMMITTEE OF THE CITY OF LITTLE ROCK, ARKANSAS, that the previously stated priorities for expansion of the city's wastewater system are reaffirmed as originally stated, and that the method of wastewater service utilized by existing and future populations of the Little Maumelle Valley is a local planning decision, and not to be dictated by an Environmental Impact Statement.

ADOPTED this 21st day of October, 1981.

SEWER COMMITTEE OF THE CITY OF LITTLE ROCK, ARKANSAS

Louis J. Schaufele - Chairman

Woodson D. Walker - Secretary

Catherine Hamilton

Ted C. Treadway

Gus M. Vratsinas

3-28

4. EPA does not feel that septic tanks are inherently unreliable as method of treating individual household wastewater. The Soil Conservation Service has identified soils covering approximately 45 percent of proposed service are in Maumelle valley which are suitable for the operation of septic tanksoil absorption systems. The Rules and Regulations Pertaining to Sewage Disposal Systems and Installers as Provided in Act 402 of 1977 provides both adequate design criteria for such systems and an effective method of control through their permit system.

EPA agrees that the method of providing wastewater service to the Little Maumelle valley is a local planning decision, so long as no federal or state laws and regulations are violated. However, when that method of service includes a request for federal Construction Grant funds, and that request may result in a significant affect on the quality of the human environment, then an EIS is required. The aim of the EIS and preliminary facilities planning are to determine the most cost-effective and environmentally preferred method of expending federal funds to solve the problem. The EIS does not prevent alternative methods of providing service, so long as federal funds are not used.

**Little Rock Wastewater Utility**

221 E. Capitol
Little Rock, Arkansas 72202
501/376-2903

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

RECEIVED
NOV 19 1981
S & A DIVISION

November 16, 1981

Mr. Clinton B. Spotts
Regional EIS Coordinator
EPA, Region VI
1201 Elm Street
Dallas, Texas 75270

RE: Wastewater Treatment Facilities
Little Rock (Adams Field), Arkansas

At the public hearing on the Draft EIS, held in Little Rock on Thursday, November 12, 1981, public comments included two topics which may require clarification. Your consideration of this additional information on these topics for inclusion into the hearing record would be appreciated.

Little Maumelle Valley Sewerage: Many commentors, including the Grantee itself, questioned the wisdom of relying on septic tanks and other individual systems for the presently unserved portion of the valley, while others endorsed the recommendations. In order to place this topic in perspective, please consider the comment from the Facility Plan: ".... the flow from the unsewered portion of Eastern Little Maumelle has no practical impact on the Adams Field Plant". (page III-2, Facility Plan, January - 1981)

The purpose of the 201 Facilities Planning Grant no. C-050490-1 is to determine the most cost-effective and environmentally sound alternative to allow the Adams Field Wastewater Treatment Plant to achieve its permit limitations during the planning period. None of the alternatives considered for the Maumelle Valley will affect the present or future performance of the plant, so that this issue should be considered as peripheral, and not allowed to delay or confuse the primary purpose of the study.

College Station Community Sewerage: The College Station community is not a part of the study area of this Grant, as was noted by several commentors. The Little Rock - North Little Rock Regional Wastewater Management Plan (The "208" Plan) in the Treatment Plan, published March, 1979, includes College Station in Area 11, which also includes Sweet Home, and other suburban areas in Southeast Pulaski County. The "208" Plan recommends serving Area 11 by expanding the Fourche Wastewater Treatment Plant, now under construction with EPA "201" Construction Grant Assistance (project C-050426-03).

Response

No response necessary

The Fourche Plant was awarded a grant by EPA to serve the populations in Southwest Little Rock lying in Area 10 of the "208" Plan, and constitutes an initial implementation of service to Area 10. The "208" Plan also comments (p. III-73, Technical Plan) that portions of Area 11 need service immediately, due to septic tank problems. In recognition of this, design of the Pump Station located east of College Station included a gravity connection, for future construction of the recommended line 10A3 from the "208" Plan.

The priority listing by the Arkansas Department of Pollution Control and Ecology (ADPC & E) for the Fourche project was to serve Improvement District #142, located in Southwest Little Rock, and ADPC & E officials were insistent in their review of the Step I Facility Plan that its service be limited to this area, for the purposes of the Grant.

The "208" Plan does not consider serving College Station into the Adams Field Plant, but recommends serving it entirely into Fourche, through regional pumping stations no. 11-1, 11-2 and 11-3, to be constructed at strategic locations south of College Station, plus a relatively small area served into the Fourche Pumping Station now under construction. Stations 11-1, 2 & 3 would discharge directly into the Fourche Plant. More detailed studies by College Station's engineer have shown that part of College Station may be more economically served by gravity interceptors discharging into the Adams Field Trunk Sewers, when the treatment capacity of Adams Field can be shown to be adequate.

Our discussions with the College Station officials and engineers have centered on methods of implementing these two connections, with the Adams Field Connection considered as an implementation refinement of the "208" Plan. In all of our discussions, we have never refused to allow service to College Station, but we have refused to waive the policy of requiring annexation to the City of Little Rock before approving service to a previously unserved area. College Station has appealed this refusal to the Little Rock City Board of Directors, and the Board has also refused to waive annexation, but has directed the Sewer Committee to continue enforcment of this policy.

In response to previous questions, EPA has advised us that a Grantee is not prohibited from enforcing such a policy by accepting Federal Grants. A copy of the letter outlining EPA policy is attached.

Thank you for the opportunity to comment on this document. Your consideration of these comments would be appreciated.

LITTLE ROCK WASTEWATER UTILITY

J. E. Gardner

J. E. Gardner, P. E.
Manager

**Little Rock Wastewater Utility**

221 E. Capitol
Little Rock, Arkansas 72202
501/376-2903

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

RECEIVED
NOV 19 1981
S & A DIVISION

November 16, 1981

Mr. Clinton B. Spotts
Regional EIS Coordinator
EPA, Region VI
1201 Elm Street
Dallas, Texas 75270

RE: Wastewater Treatment Facilities
Little Rock (Adams Field), Arkansas

At the public hearing on the Draft EIS, held in Little Rock on Thursday, November 12, 1981, public comments included two topics which may require clarification. Your consideration of this additional information on these topics for inclusion into the hearing record would be appreciated.

Little Maumelle Valley Sewerage: Many commentors, including the Grantee itself, questioned the wisdom of relying on septic tanks and other individual systems for the presently unserved portion of the valley, while others endorsed the recommendations. In order to place this topic in perspective, please consider the comment from the Facility Plan: ".... the flow from the unsewered portion of Eastern Little Maumelle has no practical impact on the Adams Field Plant". (page III-2, Facility Plan, January - 1981)

The purpose of the 201 Facilities Planning Grant no. C-050490-1 is to determine the most cost-effective and environmentally sound alternative to allow the Adams Field Wastewater Treatment Plant to achieve its permit limitations during the planning period. None of the alternatives considered for the Maumelle Valley will affect the present or future performance of the plant, so that this issue should be considered as peripheral, and not allowed to delay or confuse the primary purpose of the study.

College Station Community Sewerage: The College Station community is not a part of the study area of this Grant, as was noted by several commentors. The Little Rock - North Little Rock Regional Wastewater Management Plan (The "208" Plan) in the Treatment Plan, published March, 1979, includes College Station in Area 11, which also includes Sweet Home, and other suburban areas in Southeast Pulaski County. The "208" Plan recommends serving Area 11 by expanding the Fourche Wastewater Treatment Plant, now under construction with EPA "201" Construction Grant Assistance (project C-050426-03).

Response

No response necessary

The Fourche Plant was awarded a grant by EPA to serve the populations in Southwest Little Rock lying in Area 10 of the "208" Plan, and constitutes an initial implementation of service to Area 10. The "208" Plan also comments (p. III-73, Technical Plan) that portions of Area 11 need service immediately, due to septic tank problems. In recognition of this, design of the Pump Station located east of College Station included a gravity connection, for future construction of the recommended line 10A3 from the "208" Plan.

The priority listing by the Arkansas Department of Pollution Control and Ecology (ADPC & E) for the Fourche project was to serve Improvement District #142, located in Southwest Little Rock, and ADPC & E officials were insistent in their review of the Step I Facility Plan that its service be limited to this area, for the purposes of the Grant.

The "208" Plan does not consider serving College Station into the Adams Field Plant, but recommends serving it entirely into Fourche, through regional pumping stations no. 11-1, 11-2 and 11-3, to be constructed at strategic locations south of College Station, plus a relatively small area served into the Fourche Pumping Station now under construction. Stations 11-1, 2 & 3 would discharge directly into the Fourche Plant. More detailed studies by College Station's engineer have shown that part of College Station may be more economically served by gravity interceptors discharging into the Adams Field Trunk Sewers, when the treatment capacity of Adams Field can be shown to be adequate.

Our discussions with the College Station officials and engineers have centered on methods of implementing these two connections, with the Adams Field Connection considered as an implementation refinement of the "208" Plan. In all of our discussions, we have never refused to allow service to College Station, but we have refused to waive the policy of requiring annexation to the City of Little Rock before approving service to a previously unserved area. College Station has appealed this refusal to the Little Rock City Board of Directors, and the Board has also refused to waive annexation, but has directed the Sewer Committee to continue enforcment of this policy.

In response to previous questions, EPA has advised us that a Grantee is not prohibited from enforcing such a policy by accepting Federal Grants. A copy of the letter outlining EPA policy is attached.

Thank you for the opportunity to comment on this document. Your consideration of these comments would be appreciated.

LITTLE ROCK WASTEWATER UTILITY

J E Gardner

J. E. Gardner, P. E.
Manager

**METROPLAN**

A COUNCIL OF LOCAL GOVERNMENTS TELEPHONE AREA CODE 501 372 3300

November 10, 1981

Mr. Harless Benthul, Attorney
201 EIS Coordinator
U.S. Environmental Protection Agency
First International Building
1201 Elm Street
Dallas, Texas 75270

Dear Mr. Benthul:

I am forwarding to you a resolution passed by the Metroplan Board of Directors. The resolution addresses the recommendations contained in the facility plan and environmental impact statement (EIS) prepared for the Adams Field Sewage Treatment Plant project. I appreciate, too, this opportunity to comment on these documents.

Metroplan and the community in general have recognized for some time that the Adams Field Plant is overloaded and in serious need of renovation. After reviewing the facility plan, I am pleased to say that the recommendations contained in it are adequate to achieve the necessary expansion of capacity and upgrading of treatment. I note, too, that the EIS finds no adverse impact with the plant expansion as proposed.

However, the facility plan and the EIS contain a recommendation that the present service area for Adams Field be retained and that subsequent growth to the northwest of the city, generally along Highway 10 in the Maumelle area, be managed through individual systems. Even under the best soil conditions septic tanks often prove troublesome because of improper installation and poor maintenance, and the soils outside of the present service area are far from ideal. It is simply not acceptable to recommend that the growth of the city to the northwest be managed through the septic tank alternative. The City of Little Rock and the Little Rock Wastewater Utility have worked harmoniously to insure the intelligent growth of the city by developing sound technical and political solutions to a variety of planning problems. This will continue to mean the extension of collection and treatment system service to all of the city's residents. Indeed, I think it is inappropriate for the EIS and facility plan engineers to have considered issues relating to the development of the city beyond the limited questions of improving Adams Field. Development issues are better addressed locally through the City Board of Directors and other policy-making authorities.

WALLACE BUILDING 105 MAIN STREET LITTLE ROCK, ARKANSAS 72201

3-31

Response

The EIS and facility plan engineers considered service to the Little Maumelle valley when it was included as part of the Little Rock Wastewater Utility's grant application. The Little Maumelle valley was included as part of the Adams Field WWTP service area as a result of a previous EIS and the conclusions of the 208 Wastewater Management Plan. EPA agrees that growth management is a local planning issue. However, when the service of the Little Maumelle area was proposed, EPA must consider the necessity for new collector sewers for public health or water quality reasons and determine that sewers are cost effective when alternative strategies are considered. The EIS did not formulate future development plans, but rather evaluated alternative wastewater treatment plans in light of population projections and land use plans developed by local agencies.

Finally, the EPA and the Governor of Arkansas have approved the Little Rock Wastewater Utility as the designated management agency for sewer service in all of Pulaski County south of the Arkansas River. This was a recommendation of the metropolitan 208 plan which provides for the orderly extension of sewer facilities along the perimeter of the growing city. The plan specifically recommended against the use of septic tanks except where unavoidable. I concur with this recommendation.

Sincerely,

Jason Rouby
Executive Director

Enclosure

cc: Mr. Charles Bussey, Mayor
Mr. Bill Beaumont, County Judge
Mr. Jerry Gardner, LRWWU
Mr. Jarrell Southall, ADPC&E

**METROPLAN**

A COUNCIL OF LOCAL GOVERNMENTS TELEPHONE AREA CODE 501 372 3300

A RESOLUTION
ENDORSING THE EXPANSION OF THE
ADAMS FIELD SEWAGE TREATMENT FACILITY
LITTLE ROCK, ARKANSAS

WHEREAS, The Metroplan Board of Directors, interested in improving the health and the environment of the community;

WHEREAS, An expansion of the Adams Field Sewage Treatment Facility will contribute to improving the health and envirenment of the community;

WHEREAS, The proposed expansion is consistent with the Section 208 Water Quality Management Plan;

NOW, THEREFORE BE IT RESOLVED by Metroplan:

Section 1. That the Board of Directors of Metroplan does hereby endorse and support the proposed expansion of the Adams Field Sewage Treatment Facility and;

3-33 Section 2. That the Board of Directors of Metroplan requests that the United States Environmental Protection Agency quickly approve the Adams Field facilities plan and the Environmental Impact Statement for the project with the exception of that portion referring to Maumelle Valley.

Section 3. That this resolution shall be in effect from and after its adoption.

Passed and approved this 28th day of October, 1981.

W. E. Beaumont, President

I hereby certify that this resolution was adopted by the Board of Directors of Metroplan at a meeting held October 28, 1981.

Jason Rouby, Secretary

Response

No response necessary

United States Environmental Protection Agency
Region 6 1201 Elm Street
Dallas, Texas 75270

Re; EPA 906/9-81-005 October, 1981
Environmental Impact Statement
Wastewater Treatment Facility
Little Rock(Adams Field), Ark.
Public hearing November 12, 1981

I am Evelyn Kreth chairman of Community Association for Maumelle Preservation, Inc.

After reviewing the draft Environmental Impact Statement, our organization endorses the findings and conclusions of this document. Alternative 1 will provide the basis for future orderly development.

The EIS, 1978 for Little Maumelle and the Special Study, 1979 (LR-NLR Regional Wastewater Management Plan) have the same conclusions as does this draft EIS pertaining to the Little Maumelle Valley. Therefore, we endorse these findings as written.

Our organization wishes to thank the EPA officials, the Little Rock Wastewater Utility officials, the various consultants, and the Citizens Advisory Committee for their efforts.

Evelyn Kreth, Chairman
CAMP, Inc.

Response

No response necessary

United States Environmental Protection Agency
1201 Elm Street
Region 6
Dallas, Texas 75270

Re: EPA 906/9-81-005 October, 1981
Environmental Impact Statement
Wastewater Treatment Facility
Little Rock (Adams Field), Ark.
Public Hearing November 12, 1981

My name is Becky Harris, member of the Citizens Advisory Committee and a member of Community Association for Maumelle Preservation. I would like to thank the EPA for the opportunity to serve on the Advisory Committee and to participate in the facility planning process and the EIS. Through the studies and reports that have preceded this hearing, I have learned much and gained knowledge through this experience.

Attached to this comment is a letter of September 3, 1981, to Jerry Gardner, manager of the Little Rock Wastewater Utility, which I would like to have made a part of this record.

The preferred EPA alternative 1 represents an economically sound analysis of the environmental issues. The enactment of this alternative should provide the tool for future development of Little Rock.

Again, thank you for the opportunity to serve on the Citizens Advisory Committee and I do endorse the findings of the EIS.

Becky Harris
CAC member
CAMP member

Response

No response necessary

September 3, 1981

J. E. Gardner
Little Rock Wastewater Utility
221 East Capital
Little Rock, AR 72202

Dear Mr. Gardner,

Thank you for this oppertunity to comment on the Draft EIS for Adames Field. The following are my opinions based on the information provided through the Five Working Papers and the draft EIS.

1. Fouche Creek Interceptor.
   The 60" gravity line should be constructed rather than the force main due to less O & M cost.

2. Considering the low population increase expected (approxmatley 11,500 persons), the Little Maumelle area can best be served by septic tanks on suitable soil.

3. The flow increase expected from the Little Maumelle area (½ MGD) would not enhance the construction of a treatment plant in the area.

4. Energy recovery (methane gas) is an economic milestone and the Utility should be complimented for its innovative techniques implemented in the Adams Field and Fouche plants.

Our group (Community Association for Maumelle Preservation) greaty appreciates the oppertunity to be represented on the Citizens Advisary Council.

Compliments to all the preparers involved for the information provided.

Sincerely,

Becky Harris

Becky Harris
CAMP, Inc.
Rt. 5 Box 586
Little Rock, AR 72212
501 - 868-5868

Response

No response necessary.

November 3, 1981

U. S. Environmental Protection Agency

The Realtors of this area have always supported the efforts of governmental agencies charged with the responsibility of assuring planned and orderly growth of our community.

It is apparent to all individuals concerned with the development of Western Little Rock that the enlargement and strengthening of the Little Maumelle Valley sewage pumping facilities is a vital step to offering more attractive homes to the residents of this area. To suggest the use of septic tanks to dispose of wastewater would be like stepping backwards in time. Septic tanks have a history in this area of being environmentally unsound and unreliable, not to mention the difficulty of regulating septic tank installations and use.

Therefore, we strongly recommend and concur with the resolution adopted the 21st day of October by the Sewer Committee of the City of Little Rock.

Sincerely

Jim Rodgers

Jim Rodgers, President
Little Rock/North Little Rock
Board of Realtors

mwb

Response

see Response on page 35

November 5, 1981

Harless Benthul
U.S. Environmental Protection Agency
First International Building
1201 Elm Street
Dallas, Texas 75270

Dear Mr. Benthul:

I am a contractor in the Little Rock area and I am concerned about the orderly growth of the area. I would like to make a few comments about the Draft Environmental Impact Statement and Facilities Plan. First, the Adams Field Sewage Treatment Plant must be expanded in order to meet the needs of a growing city. That is hardly an issue. However, the EIS points to another alternative and that is the recommendation that any new development outside the existing sewer system must use septic tanks. This idea does not encourage orderly growth or development and I feel that this conclusion should be more closely reviewed. Thank you very much.

Sincerely,

Bob Townsell

Bob Townsell
Townsell-Hill Inc.

3-38

Response

see Response on page 35

November 5, 1981

Harless Benthul
U.S. Environmental Protection Agency
First International Building
1201 Elm Street
Dallas, Texas 75270

Dear Mr. Benthul:

I have been a resident and businessman in Little Rock for many years. The growth of the city in an orderly, environmentally sound fashion should be a high priority for everyone. The Adams Field Sewage Treatment must be expanded to accommodate the future needs of Little Rock. The EIS recommends the area in the Little Maumelle Valley presently served by septic tanks continue this type of sewage treatment. This practice, if followed, could have a strong effect on the orderly growth of the area and encourage urban sprawl along with possible adverse environmental consequences.

3-39

Sincerely,

George Wimberly
State Representative

Response

see Response on page 35

November 6, 1981

Mr. Harless Benthul
Region VI
U.S. Environmental Protection Agency
First International Building
1201 Elm Street
Dallas, Texas 75270

Re: Adams Field EIS

Dear Mr. Benthul:

It has come to my attention that an EIS concerning future sewage treatment for Little Rock, Arkansas is currently under review by EPA. I would like to have the following comments filed for record.

First, I support the expansion of the Adams Field Sewage Treatment Plant. Expansion of this plant should help meet the City of Little Rock's needs.

Secondly, I strongly disagree with the EIS recommendations made in regard to expansion of sewage system immediately west of Little Rock, along State Highway 10 in the Little Maumelle area. This recommendation, if followed, would not encourage the orderly growth of the city. Growth would be thrust to the southwest along Interstate 30. This area is growing, and will continue to grow, at a rapid pace. The EIS's recommendations will have the affect of encouraging the unplanned proliferation of septic tanks. Growth can be more properly managed if it is allowed to occur along the entire western boundary of the city.

The EIS should be amended to allow for orderly growth, by recommending the extension of the sewage system west of Little Rock.

Yours truly,

Jean Turner Carter
Attorney At Law

Response

see Response on page 35

Bobby Roberts
51 Warwick
Little Rock, Arkansas
November 7, 1991

Mr. Marless Benthul
Metroplan
Wallace Building
105 Main Street
Little Rock, Arkansas 72201

Dear Mr. Benthul:

As a citizen of Little Rock, I am pleased to learn of the planned construction of the Fourche Wastewater Treatment Plant. I am particularly glad to see that the facility will employ environmentally safe anaerobic sludge digestors and that the resulting methane gas will be used for co-generation of electricity. Systems that protect our water resources from pollution, produce needed energy, and encourage planned urban development are essential if Little Rock is to create an atmosphere that both encourages orderly economic growth and protects the quality of life for our citizens.

However, I am disturbed that such a forward thinking approach is not emerging for the Little Maumelle Valley. I refer specifically to the Facility Plan's recommendation that the most economical solution for the valley would be to confine the sewer system within its existing boundaries and to require new growth outside of the present grid to use septic tanks. Such a program is shortsighted for at least two important reasons.

First, The development of a sewer network that can accomodate future needs will help insure that the Maumelle Valley's growth is orderly. Sewer systems, and other similar public services, are the vanguard of new settlement; the location and design of

Response

see Response on page 35

these systems help determine what kind of development we will have and where it will be located. Without these sewer grids, growth becomes uncontrolled and soon residences, farms, small business, etc., are intruding on each other. The result is chaotic development of our limited land.

Second, The wide scale use of septic tanks in a concentrated area will, over the years, create thousands of small, but collectively damaging, sources of groundwater pollution. Since good groundwater is essential to both economic development and safe living, it is crucial that it be protected. Unfortunately, the cumulative pollution will reach a crisis level in the Maumelle Valley's groundwater, but it will be almost impossible to correct so many non-point sources that the septic tanks represent. Then the taxpayer must face an unpleasant alternative - spend many millions of dollars to correct the problem or allow dangerous and economically debilitating groundwater pollution to continue unabated.

I do not think that it is wise to sacrifice the long term well being of the Maumelle Valley and its citizens for short term reasons of economy. Why not do it right the first time and build an adequate sewer network. Such a system would protect our environment, allow for rational development, and, in the long run, save the taxpayers money.

Sincerely,

Bobby Roberts

BR:jmg

November 9, 1981

Mr. Clinton B. Spotts
Regional EIS Coordinator
EPA, Region 6
1201 Elm Street
Dallas, Texas 75270

Dear Mr. Spotts:

The Board of Directors of the Central Arkansas Chapter of the Arkansas Society of Professional Engineers (CAC-ASPE), representing approximately 330 engineers in the central Arkansas area, hereby goes on record as endorsing the Resolution of the Sewer Committee of the City of Little Rock, Arkansas, adopted the 21st day of October, 1981, commenting on the Draft Environmental Impact Statement (DEIS) dated October, 1981, concerning improvements to the City's Adams Field Treatment Plant, including the Little Maumelle service area, as published by the United States Environmental Protection Agency (USEPA).

Approved by the CAC-ASPE Board of Directors at their regular Board Meeting in Little Rock on November 9, 1981.

John M. Bufford

John M. Bufford, P.E.
Chapter Director
Chairman of DEIS Assessment Committee

CAC-ASPE Officials

Grady E. Harvell, P.E., President
Dennis E. Taylor, P.E., First Vice President
James D. Brazil, P.E., Second Vice President
Stewart Noland, P.E., Sec-Treasurer
John M. Bufford, P.E., Chapter Director
Michele Kerr, P.E., Chapter Director
Lawrence Fletcher, P.E., Chapter Director
James Tanner, P.E., Chapter Director

Response

see Response on page 35

# Greater Little Rock Chamber of Commerce

WILLIAM PERRY
Chief Executive Officer
and Executive Vice President

November 9, 1981

Mr. Clinton B. Spotts
Regional EIS Coordinator
U. S. Environmental Protection Agency
Region VI
First International Building
1201 Elm Street
Dallas, Texas 75270

Re: Draft Environmental Impact Statement
Wastewater Treatment Facilities
Little Rock (Adams Field), Arkansas

Dear Mr. Spotts:

The Greater Little Rock Chamber of Commerce has reviewed the Draft EIS for improvements to the city's Adams Field Wastewater Treatment Plant and service area. We offer the following comments on this document and request that these comments be included in the record of the public hearing set for Thursday, November 12, 1981:

1. The recommendations for increasing the Wastewater Treatment capacity of this plant should be implemented without delay. Enlargement and modernization of this facility is vital in order to maintain the high quality of the Arkansas River and the public health of this city. This plant consistently treats more wastewater than its intended maximum and is able to meet its NPDES permit limits on most occasions only by the extraordinary efforts of its operating staff and management, at great expense to the users.

2. The recommendations for construction of a pumping station to relieve a hydraulic inadequacy on the interceptor system seems unwise. An additional gravity-flow relief interceptor would not consume any energy and would have only a minimal operating expense. The economic analysis which assumes otherwise does not consider the true costs of a pumping facility, and its relative reliability.

3. The recommendations for wastewater service to the presently unserved areas of the Little Maumelle Valley

3-44

Response

see Response on pages 34 and 35

3. (continued)

are not in the city's best interests, either environmentally or economically. They are based on the assumption that septic tanks do in fact function as intended, and an effective method of control of septic tank installation and use exist. Neither assumption is valid in central Arkansas, nor in the United States as a whole, in our knowledge. Recent testimony regarding a proposed sewer improvement district to a suburban residential area indicated a failure rate of 80 percent for septic tanks.

If septic tanks are to be the Wastewater Treatment method for the Maumelle Valley, we are confident that in a very few years, it will be necessary to replace them with a community sewer system, as has been the history of all of Little Rock's development areas up to the 1960's. This places an unfair double economic burden on the citizens, which sound planning should be able to prevent.

Little Rock's best interests are met by endorsement of the collection system Alternate No. 9 in the Facility Plan, for the Little Maumelle Valley. The community has demonstrated in the past its economic ability to implement universally acceptable projects such as this, through a combination of public and private investment.

Your thoughtful consideration of these comments would be appreciated.

Very sincerely,

J. William Perry

JWP:crew

3-45

BAPTIST MEDICAL CENTER SYSTEM

RECEIVED

November 10, 1981

Mr. Harless Benthul
U.S. Environmental Protection Agency
X Metroplan - Council of Governments
105 Main Street
Little Rock, AR 72201

Re: Remodeling and Expansion of Waste Treatment Facilities

Dear Mr. Benthul:

Baptist Medical Center System (BMCS) appreciates the opportunity to comment with respect to the City's plans for increasing its capacity for waste treatment. Our organization operates two acute care institutions in the city, with an aggregate licensure of 857 beds. Approximately 3,500 persons are employed by BMCS in the greater Little Rock area.

It is my understanding that the Facility Plan calls for extension of the Adams Field treatment plant to a capacity of 36 MGD. The Plan also includes the 1983 startup of the new Fourche Creek plant, adding 15 MGD to citywide treatment capability. Baptist Medical Center System wishes to express its support for these projects. Little Rock will need the facilities to accomodate its role as a prime sunbelt location for industrial development.

Furthermore, the city has evolved as a centralized source of specialty health care. There is an increasing frequency of acute medical case referrals from across the state to the major hospitals located in the city. Such referrals result in waste volume increases beyond that associated with normal population growth. These wastes are of a nature requiring sophisticated treatment such as that proposed in the Facility Plan prepared by the City's engineers.

We are concerned about the proposal for disposing of Maumelle Valley waste via septic tanks. Waste generated by hospitals certainly require a higher level of treatment. Aside from such medical related needs, I feel that the use of septic tanks as a primary treatment method for new development in the northwest sections of the city would be aesthetically undesirable. It would also be diseconomical, as area population density increases to the point where conversion to centralized collection is required to ensure a healthful environment.



Response

Under the site planning and operation restriction identified in the preliminary planning, the use of septic tanks should be neither unaesthetic or uneconomic. There are no reported health hazards associated with the use of septic tanks in the Little Maumelle Valley.

Again, Baptist Medical Center System appreciates the opportunity to provide input to the public hearing process. Should you desire clarifications of the above, please contact Mr. Earl Paul, Assistant Administrator for General Services at 227-2292.

Very truly yours,

Russell D. Harrington, Jr.
Administrator and Associate
Executive Director

RDH:EWP:bc

SUMMERLIN ASSOCIATES, INC. *engineers-planners-surveyors*
1609 South Broadway / Little Rock, AR 72206 / (501) 376-1323

November 10, 1981

Mr. Harless Benthul
US EPA
1st International Building
1201 Elm Street
Dallas, Texas, 75270

RE: Comments regarding Facilities Plan and EIS Plan for Expansion to Adams Field Sewage Treatment Plant - Little Rock, Arkansas

Dear Mr. Benthul:

I have been a resident of Little Rock for fourteen years and have operated a consulting engineering business here for the past seven years. I am, therefore, interested in the environmental and economic well-being of the City and would like to comment regarding the above referenced project.

I am in favor of the proposed expansion to the Adams Field Sewage Treatment Plant. This expansion is necessary because of the growth of Little Rock. The sewer service areas should be extended to accommodate city growth, which will, of course, increase plant loadings. Areas in the western parts of the City are experiencing much of the growth pressure. I feel that these areas should be included in the sewer service areas, because from past experience, I do not feel that septic tanks will adequately serve these areas over the long term.

Thank you for your consideration. I will be happy to discuss the contents of my letter with you at anytime.

Sincerely,

SUMMERLIN ASSOCIATES, INC.

James C. Summerlin

JAMES C. SUMMERLIN, P. E.

JCS:arh

Response

see Response on page 35

HOME BUILDERS ASSOCIATION
of GREATER LITTLE ROCK

P.O. BOX 755 • 2901 MAIN STREET • NORTH LITTLE ROCK, ARKANSAS 72115 • PHONE (501) 758 3646

November 12, 1981

U.S. Environmental Protection Agency - Region 6
1201 Elm Street
Dallas, Texas 75270

Attention: Mr. Clinton B. Spotts
Regional EIS Coordinator

Dear Sir:

Because of its impact on future residential construction and development activities in Northwest Little Rock, the Home Builders Association of Greater Little Rock is most anxious to comment on the Draft Environmental Impact Statement For Wastewater Treatment Facilities, Little Rock (Adams Field), Arkansas, Grant #C-050490-1.

In spite of the fact that production levels within the homebuilding industry are currently extremely depressed, we have every reason to believe that the mid-to-longer range prospects for residential land development and construction present a much more encouraging picture. Our demand factor studies indicate that the housing market that has flourished in the northwest quadrant of Little Rock for the past decade and a half will continue into the years immediately ahead, as our industry attempts to meet what is currently an unanswered, pent-up housing demand. Quite naturally, continued activity in this geographical area will be predicated on the availability of those applicable municipal services, which are absolutely essential if a constant and substantive growth factor is to be achieved.

In reviewing the alternatives presented in the DEIS, as they apply to the Little Maumelle Valley, we find ourselves to be in complete concurrence with the findings of the Little Rock Sewer Committee. We applaud the Sewer Committee for its past efforts to expand the public sewer system in the Little Maumelle Valley and we heartily endorse their re-commitment to this strategy, which in our minds is essential if the appropriate growth potential of this area is to be realized. We, too, must strongly question the DEIS assumption that reliance on the use of individual sewage treatment systems (septic tanks) represents the most acceptable alternative for proposed development. Unacceptable soil conditions in certain portions of this area preclude its use for residential development purposes under this methodology, and as such, represent a non-cost effective approach to the establishment of economically feasible development criteria; an ingredient that is absolutely essential in today's high risk and affordability-oriented land development market.



3-46

Response

see Response on page 35

It is for these reasons that we support the resolve of the Little Rock Sewer Committee and endorse their stated desire to utilize their plan, which calls for the pumping of wastewater from the Little Maumelle Valley into the Adams Field Plant collection system. It is our feeling that this plan most appropriately and effectively interfaces with the industry's stated goal of the optimum utilization of the developable land in this area in a manner that will provide the most acceptable opportunities for the housing of existing and future populations in this potentially strong housing market area.

Sincerely,

HOME BUILDERS ASSOCIATION OF GREATER LITTLE ROCK

Bruce E. Blackall

Bruce E. Blackall
Executive Vice President

sd

LEE STEPHENS
APPRAISAL SERVICE

P.O. BOX 7301 LITTLE ROCK, ARKANSAS 72217 (501) 227-6137

November 12, 1981

Mr. Harless Benthul
USEPA
1201 Elm Street
First International Bldg.
Dallas, Texas 75270

Dear Mr. Benthul:

I would like to express my concern that the use of septic systems in northwestern parts of Pulaski County may cause serious problems in that it will not provide for orderly growth in this area.

It appears to me that several sites should be analyzed for a treatment plant to provide an adequate sewer system for growth over the next 25 years.

However, I am very much in favor of enlarging and modernizing the present facility at Adams Field.

Sincerely,

Lee Stephens

Response

see Response on page 35

B. J. McCoy
ATTORNEY AT LAW
SUITE 903 DONAGHEY BUILDING
LITTLE ROCK, ARKANSAS 72201
(501) 372-7350

November 17, 1981

RECEIVED
NOV 20 1981
T & A DIVISION

Mr. Clinton B. Spotts
Regional EIS Coordinator
U.S. Environmental Protection Agency, Region 6
1201 Elm Street, Suite 2800
Dallas, Texas 75270

RE: Draft Environmental Impact Statement For Wastewater Treatment Facilities Little Rock (Adams Field), Arkansas
Grant No. C-050490-1

Dear Mr. Spotts:

On behalf of the residents of the College Station Community Pulaski County, Arkansas, I request inclusion of the College Station Community in the service area for the proposed Adams Field Wastewater Treatment Facilities.

College Station in an unincorporated, low-income, community, 4½ miles from downtown Little Rock. The community has a population of approximately 3,500 persons. According to a 1978 EPA funded, Pulaski County Water, Sewer, Solid Waste Assesment prepared by the Arkansas Department of Pollution Control and Ecology, Arkansas Health Department and other relevant state and local agencies, College Station has both pollution and health problems which are directly related to lack of a sanitary sewer system. Further, eighty-six percent (86%) of the community is served by septic tanks which have a 72% failure rate because of unsuitable soil and density of housing.

It is interesting to note that this residential community which lies within the boundaries outlined in the EIS, is for purposes of the EIS nonexistent. Is it just an oversight that 3,500 persons who live in College Station near Fourche Creek and lack a sanitary sewer system were not mentioned?

The lack of sewer services in this community impacts negatively on the overall Environmental Protection Agency effort to improve water quality standards in the Little Rock/North Little Rock Metropolitan Area. As I understand it, the City of Little Rock has been designated with management agency responsibility for the area south of the Arkansas River under the 208 Water Quality Management Plan. It is likely that the population figures reflected in all of the planning documents, as well as, the EIS include the College Station Community.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION VI
1201 ELM STREET
DALLAS, TEXAS 75270

December 21, 1981

Mr. B. J. McCoy
Attorney at Law
Donaghey Building, Suite 903
Little Rock, Arkansas 72201

Dear Mr. McCoy:

This is in response to your letter of November 5, 1981, regarding the College Station community.

We are enclosing copies of maps of the planning areas for the two current Little Rock projects. It should be noted that the maps do not include the College Station community within their planning areas. During the planning for the Upper Fourche project the public participation requirement applicable at that time was satisfied by the public hearing covering the facilities plan and the environmental assessment. The Adams Field project used a full-scale public participation program that provided review and recommendations to the city in accordance with current regulations and guidelines, culminating in the official public hearing held on November 12, 1981. Since the planning areas did not include the College Station community, it was not represented in the planning process.

In your letter you made reference to the Regional Wastewater Management Plan (208Plan) and its inclusion of College Station. Although the 208 Plan made note of the College Station wastewater treatment needs, it did not require any particular facilities plan (201 Plan) to include the community. The 208 Plan is necessarily general in scope because of its subject matter, and states that "The locations and configurations are estimated for preliminary planning purposes and should be considered as approximate, rather than specific. ...(they) are not specific requirements of the plan"(see page III-19 of the 208 Plan). The plan, on pages III-73 and III-74 also implies that there are areas within the Fourche Creek planning area with more immediate needs than College Station.

Your letter reiterated your desire to have College Station included in the scope of these planning areas, and a copy of an Environmental Protection Agency (EPA) letter to Mr. Jerry Gardner, written during our review of the Upper Fourche project, was attached. This letter asked the city to furnish a schedule and institutional arrangements for providing service to the College Station and Sweet Home communities. The response cited the fact that the city does not provide service to unincorporated areas and the earlier unsuccessful efforts to effect annexation of these communities. It has been our policy not to become involved in annexation matters, since we consider annexation to be a local concern.

It is our understanding that approximately 50 million dollars, mostly federal will be expanded to construct the Upper Fourche and Adams Field Wastewater Treatment Facilities. College Station residents were not aware of the 34 million dollar Upper Fourche Project until construction was begun along their community boundaries. They were immediately informed that they would not be served by the project.

Finally, I must ask you to consider whether the Adams Field Project is a municipal improvement or an EPA funded project consistent with relevant federal legislation and the 208 Water Quality Management Plan. If the Adams Field Project is a municipal improvement, we feel that whether College Station is served is a local matter. If however, the project is funded by EPA to improve water quality standards south of the Arkansas River consistent with federal legislation and the 208 Water Quality Management Plan, we respectfully request inclusion of the College Station Community in the service area for the proposed project.

I am hopeful that funds for the design and construction of this project will not be awarded until the issue of sanitary sewer services for the College Station Community is resolved.

Sincerely,

B. J. McCoy

ls

3-53



We believe our policy of not intervening in local annexation matters does not facilitate expansion of Little Rock at the expense of water quality planning. The scopes of the 201 planning areas in question were developed by the city. The Arkansas Department of Pollution Control and Ecology (ADPC&E) approved this scope and the evaluation of needs. The project application was certified to EPA from the State priority list. The facilities plan for each of the two project areas has demonstrated the cost-effectiveness of providing service to meet the needs within those areas.

Finally, the Fourche Creek Plant was designed in accordance with 40 CFR 35.925-7 and the reserve capacity was based on population projections in the planning area. Part of this reserve could be available for College Station at the expense of future connections in the low density portions of the planning area. As you pointed out, a connection point could be available to provide future service to your community. Therefore, the current obstacle to providing service is neither noncompliance with the 208 plan nor the Upper Fourche Creek 201 Plan, but with the ongoing annexation matter.

It is my recommendation that you continue to negotiate with the city of Little Rock to obtain some relief. Your continued cooperation with the ADPC&E and with Metroplan is also suggested. If we can be of any further assistance, please let us know.

Sincerely yours,

Dick Whittington, P.E.
Regional Administrator

Enclosure

cc: Arkansas Department of Pollution
Control and Ecology
Mr. Jerry Gardner
Mr. Jarrell Southall
Director, ADPCE

ARLOVER R. CHARDSON
[illegible]
[illegible] ARKANSAS 72083

STATE OF ARKANSAS

House of Representatives

November 16, 1981

Mr. Clinton B. Spotts
Regional EIS Coordinator
EPA, Region 6 (SA-F)
1201 Elm Street, Suite 2800
Dallas, Texas 75270

RECEIVED
NOV 23 [illegible]
S & A DIVISION

RE: EIS, Draft, Wastewater Treatment Facilities
Little Rock (Adams Field), Arkansas

Dear Sir;

3-54

On Behalf of the Community of College Station, Pulaski County, Arkansas, I request that the comments stated in the public hearing on the above referenced Environmental Impact Statement, November 12, 1981, in reference to the inclusion of College Station in the Adams Field and Upper Fourche proposed projects be favorabely responded to by the U.S. Environmental Protection Agency. My request for inclusion of College Station is first as a resident of the area, second as a member of the College Station Sewer Committee, and third as a State Representative to the Arkansas General Assembly.

As a State Representative, I am in favor of the EPA Water Quality Management Efforts and the Construction Grants Program. It is with these efforts in mind that I request the total cooperation from EPA in resolving the true water quality management problems that exist in the management area for the Little Rock Wastewater Utility. The present EIS has omitted the evaluation of the impact of the much needed project on communities that are contributing to the pollution problems in Pulaski County, Arkansas.

The Little Rock Wastewater Utility and their consultants should be encouraged to identify the wastewater quality problems according to the approved 208 Water Quality Management Plan for the Little Rock SMSA. These areas should be included in the facility plan and Environmental Impact Statement.

Response

see Response on page 59

It is my understanding, that College Station would then be addressed in the EPA effort to improve water quality of the Arkansas River and Fourche Creek.

I appreciated the opportunity to participate in the public hearing on this project. However, this has been the community of College Station's first opportunity to participate in this process on its own behalf. We hope that our participation has clarified our interest in resolving the severe sewer problems experienced by our community.

Again, thank you for the opportunity to comment on the EIS Draft and we look forward to your cooperation.

Sincerely,

Grover Richardson
State Representative

GR:ls

VESCO AND ASSOCIATES
MANAGEMENT AND PLANNING, INC.
903 DONAGHEY BUILDING
LITTLE ROCK, ARKANSAS 72201
372-2638

RECEIVED
NOV 23
S & A DIVISION

November 20, 1981

Mr. Clinton B. Spotts
Regional EIS Coordinator
EPA, Region 6 (SA-F)
1201 Elm Street, Suite 2800
Dallas, Texas 75270

RE: EIS, Draft, Wastewater Treatment Facilities
Little Rock (Adams Field), Arkansas

Dear Sir:

Thank you for the opportunity to comment on the Environmental Impact Statement, Draft, Wastewater Treatment Facilities Little Rock (Adams Field), Arkansas. The EIS has identified the expansion of Adams Field treatment and the Fourche Creek interception as the favorable alternatives for wastewater management in the Little Rock SMSA.

On behalf of the residents of College Station, Pulaski County, Arkansas I support the expansion of the Little Rock Adams Field Wastewater Treatment Facility. However, I disagree with the service area identified in the EIS and the lack of concern for the water quality problems in the Little Rock management area as designated by the 208 Water Quality Management Plan.

The EIS and Facility Plan for Little Rock Adams Field and Upper Fourche Creek projects have not, in my opinion, considered the communities that are contributors to the water quality problem of the Arkansas River and Fourche Creek.

The EIS stated that the Maumelle Valley was determined not a pollution problem in a 1979 study and EPA had denied a 201 Grant. If this is true, wht is this community being considered for sewer services prior to College Station? The pollution problems in College Station have been documented by the Arkansas Department of Health, Pollution Control and Ecology, and the Soil and Water Conservation Commission.

Response

see Response on page 59

College Station has a 72% failure rate with septic tanks, where Maumelle Valley has only a 40% failure rate. College Station septic tank failure is due to unsuitable soil and density of housing. The Maumelle Valley 40% failure is due to, according to EIS, underdesign of field lines.

The EIS has presented another problem that College Station must endure without relief from present situation. The impact of the order on the community was not addressed. The report stated that the force main may create an order, but did not address the impact on College Station. Furthermore, the area is effectively removed from existence.

On page 91 in the EIS, H. Land Use, last paragraph neglected to describe the 642 structures and 3,500 residence that are adjacent to the Fourche Creek between the Industrial District, Interstate 30 and Patterson Road. This omission should be corrected in the final EIS.

The Community of College Station request your assistance in reviewing the water quality management problems in Pulaski County by including our community in the expansion of the Little Rock Adams Field Wastewater Treatment Plant. The construction of a common treatment facility for several communities is not new to the State of Arkansas or EPA. There are many communities in Arkansas that share wastewater treatment facilities. The communities of Tillar and Reed, Leadhill and South Leadhill, Elkin and Fayetteville, Dover and Russellville, Little Rock and Alexander, Hot Springs and approximately eight (8) sewer improvement districts are a few examples of communities that share wastewater treatment facilities. Please continue to encourage cooperation between communities in improving the water quality problems in Arkansas.

Again, thank you for the opportunity to comment on this EIS. Please provide a copy of the public hearing comments and final EIS for our review.

Sincerely,

Vance Simelton

ls

## LIST OF PREPARERS

David R. Gattis, Senior Environmental Planner with Freese and Nichols, Inc., of Fort Worth, Texas, served as project manager on this study since May 1981. Mr. Gattis studied environmental science and urban affairs at Texas Christian University. He has seven years of professional experience in environmental planning and the preparation of environmental impact assessments. He has assumed major responsibility for the technical direction of approximately 25 environmental studies, including preparation of the environmental impact statements for the operation of 23 military facilities in Texas, environmental assessments for Step 1 Facility Planning for Wastewater Treatment Facilities, and Section 208 areawide wastewater management plans. Mr. Gattis began his work in the Little Rock area in 1977 and has participated in three major studies in Arkansas.

Ulric P. Gibson, P.E., Senior Project Engineer with C. C. Johnson & Associates, Inc., served as senior project engineer for the EIS. Mr. Gibson has more than 22 years experience in environmental engineering work. He has 17 years management experience in environmental planning, water resources, sanitary engineering, hydrogeology and groundwater development. He has 3 years of consulting experience as Project Leader on Environmental Impact Statements and other technical studies related to the National Environmental Policy Act and other pertinent acts. He has managed a staff of 1,200 engaged in carrying out a $500 million water resources program. Mr. Gibson has a bachelor's degree in civil engineering from the University of Edinburgh, and master's in Public Health Engineering and doctorate in Environmental Health Engineering from the University of Minnesota.

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Freese and Nichols, Inc., and C. C. Johnson & Associates, Inc., 1981. Environmental Impact Technical Support Document for Adams Field Wastewater Treatment Plant, Little Rock, Arkansas. Fort Worth, Texas.

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U.S. Environmental Protection Agency, 1981. Draft Environmental Impact Statement for Wastewater Treatment Facilities, Little Rock (Adams Field), Arkansas USEPA, Region 6, Dallas, Texas.

## GLOSSARY

AERATION BASIN: A basin in which wastewater or other liquid is aerated, usually by spraying the liquid in the air, bubbling air through the liquid, or agitation of the liquid to promote surface absorption of the air.

BIOCHEMICAL OXYGEN DEMAND: A measure of the demand on a water body's dissolved oxygen supply which will be generated (over some specified period of time) by the biological decomposition of various additions of organic wastes.

A high BOD may temporarily, or permanently, so deplete oxygen in water as to kill aquatic life. The determination of BOD is perhaps most useful in evaluating impact of wastewater on the receiving water bodies.

CENTRALIZED TREATMENT SYSTEM: A wastewater treatment system in which wastes from each household is conveyed to a central wastewater treatment facility for treatment and disposal.

CITIZENS ADVISORY COMMITTEE: A committee representing elected and appointed officials, public interest groups, private citizens, and economic and special interest groups designated to provide public input into the planning process.

CONSTRUCTION GRANTS PROGRAM: An EPA program which provides a 75 percent grant to assist municipalities in the construction of wastewater treatment facilities necessary to meet State and Federal water quality standards.

EFFLUENT: The liquids discharged from domestic, industrial and municipal waste collection systems or treatment facilities.

ENVIRONMENTAL IMPACT STATEMENT: A document required by the National Environmental Policy Act (PL 91-190, 1969) when a Federal action would significantly affect the quality of the human environment. Used in the decision-making process to evaluate the anticipated effects (impacts) of the proposed action on the human, biological and physical environment.

FACILITY PLAN: A component of the preliminary planning in which engineering alternatives are formulated and evaluated in terms of cost effectiveness.

FORCE MAIN: A pressure pipe joining the pump discharge at a water or wastewater pumping station with a point of gravity flow.

GRAVITY PIPELINE: A pipeline in which the liquid runs on descending gradients from source to outlet, and where no pumping is required.

INCINERATION: Combustion or controlled burning of volatile organic matter in sludge and solid waste which reduces the volume of the material while producing heat, dry inorganic ash, and gaseous emissions.

INTERCEPTOR: A sewer that receives dry-weather flow from a number of transverse sewers or outlets and frequently additional predetermined quantities of storm water (if from a combined system), and conducts such waters to a point for treatment or disposal.

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES) PERMIT: A system of Federal and State effluent discharge permits designed to improve water quality in the Nation's waterways.

OUTFALL: The point, location, or structure where wastewater or drainage discharges from a sewer, drain, or other conduit.

PARAMETER WEIGHTS: A numerical value given to an environmental issue which identifies the relative importance of that issue.

PERCOLATION: The downward movement of water within a soil, especially the downward flow of water in saturated or nearly saturated soil.

Flow through a soil in contradistinction to the word infiltration which connotes flow through a soil.

PUMP STATION: A structure containing pumps and appurtenant piping, valves and other mechanical and electrical equipment for pumping wastewater.

RETENTION/EQUALIZATION BASIN: A holding basin in which variations in flow and composition of a liquid are averaged. Such basins are used to provide a flow of reasonably uniform volume and composition to a treatment unit.

SEPTIC TANK SOIL ABSORPTION SYSTEM (ST/SAS): A system of wastewater disposal in which large solids are retained in a tank; fine solids and liquids are dispersed into the surrounding soil by a system of pipes.

SETTLING BASIN: A basin or tank in which water or wastewater containing setteable solids is retained to remove by gravity a part of the suspended matter. Also called sedimentation basin, sedimentation tank, settling tank.

SLUDGE PUMP: Pump used to convey sludge, usually a plunger, progressing-cavity, centrifugal or torque-flow pump is used.

TOTAL SUSPENDED SOLIDS: The small, solid particles in water or sewage that cause a cloudy condition in water.

TRANSITIONAL HABITAT: Those areas which are a mix of wetlands and upland habitats.

TURBIDITY: Defined as the capacity of materials suspended in water to scatter light. It is measured in arbitrary Jackson turbidity units (JTU). Highly turbid water is often called "muddy", although all manner of suspended particles contribute to turbidity.

UPLAND HABITATS: Those areas which lie on elevated, well drained sites.

USER FEES: Monthly charges levied each customer to offset the cost of operation, maintenance, and debt service of the wastewater treatment system.

VACUUM FILTRATION: A usually continuous filtration operation that is generally accomplished on a rotating cylindrical drum. As the drum rotates, part of its circumference is subject to an internal vacuum that draws sludge to the filter medium and removes water for subsequent treatment. The dewatered sludge cake is released by a scraper.

WASTEWATER MANAGEMENT PLAN (208 PLAN): A regional plan developed to identify water quality and wastewater management needs within a metropolitan area. The plan is mandated by Section 208 of Public Law 92-500.

WETLANDS: Areas that are inundated by surface or groundwater with a frequency sufficient to support a prevalence of vegetative or aquatic life that requires saturated or seasonally saturated soil conditions for growth and reproduction. Wetlands generally include swamps, marshes, bays and similar areas.

ZONING: The demarcation of a planning area by ordinance into zones and the establishment of regulations to govern the use of the land (commercial, industrial, residential, etc.) and the location, bulk, height, and uses of structures within each zone.

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